

TSD File Inventory Index

Date: April 27, 2000

Initial: CM Kerens

Facility Name: <i>Parker & Gamble Wyandale Manufacturing Complex</i>		
Facility Identification Number: <i>DHD 092 878 368 (see Folder 1.6)</i>		
A.1 General Correspondence	<i>Y</i>	B.2 Permit Docket (B.1.2)
A.2 Part A / Interim Status	<i>Y</i>	.1 Correspondence
.1 Correspondence	<i>Y</i>	.2 All Other Permitting Documents (Not Part of the ARA)
.2 Notification and Acknowledgment	<i>Y</i>	C.1 Compliance - (Inspection Reports)
.3 Part A Application and Amendments	<i>Y</i>	C.2 Compliance/Enforcement
.4 Financial Insurance (Sudden, Non Sudden)	<i>Y</i>	.1 Land Disposal Restriction Notifications
.5 Change Under Interim Status Requests		.2 Import/Export Notifications
.6 Annual and Biennial Reports		C.3 FOIA Exemptions - Non-Releasable Documents
A.3 Groundwater Monitoring		D.1 Corrective Action/Facility Assessment
.1 Correspondence		.1 RFA Correspondence
.2 Reports		.2 Background Reports, Supporting Docs and Studies
A.4 Closure/Post Closure	<i>Y</i>	.3 State Prelim. Investigation Memos
.1 Correspondence	<i>Y</i>	.4 RFA Reports
.2 Closure/Post Closure Plans, Certificates, etc	<i>Y</i>	D. 2 Corrective Action/Facility Investigation
A.5 Ambient Air Monitoring		.1 RFI Correspondence
.1 Correspondence		.2 RFI Workplan
.2 Reports		.3 RFI Program Reports and Oversight
B.1 Administrative Record		.4 RFI Draft /Final Report

Tabl -

.5 RFI QAPP		.6 CMI QAPP	
.6 RFI QAPP Correspondence		.7 Lab Data, Soil-Sampling/Groundwater	
.7 Lab Data, Soil-Sampling/Groundwater		.8 Progress Reports	
.8 RFI Progress Reports		D.5 Corrective Action/Enforcement	
.9 Interim Measures Correspondence		.1 Administrative Record 3008(h) Order	
.10 Interim Measures Workplan and Reports		.2 Other Non-AR Documents	
D.3 Corrective Action/Remediation Study		E. Boilers and Industrial Furnaces (BIF)	
.1 CMS Correspondence		.1 Correspondence	
.2 Interim Measures		.2 Reports	
.3 CMS Workplan		F.1 Imagery/Special Studies (Videos, Photos, Disks, Maps, Blueprints, Drawings, and Other Not Oversized Special Materials.)	
.4 CMS Draft/Final Report		G.1 Risk Assessment	
.5 Stabilization		.1 Human/Ecological Assessment ...	
.6 CMS Progress Reports		.2 Compliance and Enforcement ...	
.7 Lab Data, Soil-Sampling/Groundwater		.3 Enforcement Confidential	
D.4 Corrective Action Remediation Implementation		.4 Ecological - Administrative Record	
.1 CMI Correspondence		.5 Permitting	
.2 CMI Workplan		.6 Corrective Action/Remediation Study ...	
.3 CMI Program Reports and Oversight		.7 Corrective Action Remediation Implementation ...	
.4 CMI Draft/Final Reports		.8 Endangered Species Act	
.5 CMI QAPP		.9 Environmental Justice	

Note: Transmittal Letter to Be Included with Reports.

Comments: *Documents do not justify individual folder per schedule!*

ADVERTISING ORDER

51851NALT

ORDER NUMBER

DEPARTMENT OR ESTABLISHMENT, BUREAU OR OFFICE

U.S. Environmental Protection Agency Region V Waste Mgmt. Div.

DATE
8/15/1984

The publisher of the publication named below is authorized to publish the enclosed advertisement according to the schedule provided the rates are not in excess of the commercial rates

charged to private individuals with the usual discounts. It is to be set solid, without paragraphing, and without any display in the heading unless otherwise expressly authorized in the specifications.

NAME OF THE PUBLICATION ADVERTISED IN
Cincinnati Enquirer

SUBJECT OF ADVERTISEMENT
Public Notice

EDITION OF PAPER ADVERTISEMENT APPEARED
Monday August 27, 1984

NUMBER OF TIMES ADVERTISEMENT APPEARED
One Time Only

DATE(S) ADVERTISEMENT APPEARED
August 27, 1984

SPECIFICATIONS FOR ADVERTISEMENT

Place as Legal Notice

Affidavit Required

COPY FOR ADVERTISEMENT

Please see attached Public Notice (2 pages)

AUTHORITY TO ADVERTISE	INSTRUMENT OF ASSIGNMENT
NUMBER 51851NALT	NUMBER
DATE August 17, 1984	DATE
SIGNATURE OF AUTHORIZING OFFICIAL <i>Bryette Mangle</i>	TITLE

INSTRUCTIONS TO PUBLISHERS

Extreme care should be exercised to insure that the specifications for advertising to be set other than solid be definite, clear, and specific since no allowance will be made for paragraphing or for display or leaded or prominent headings, unless specifically ordered, or for additional space required by the use of type other than that specified. Specifications for advertising other than solid and the advertisement copy submitted to the publisher will be attached to the voucher. The following is a sample of solid line advertisement set up in accordance with the usual Government requirements.

DEPARTMENT OF HIGHWAYS & TRAFFIC,
D.C. Bids are requested for first spring 1988 cement concrete repair contract, including incidental work, Washington, D.C., Invitation No. C-5576-B, consisting of 11,690 sq. yds. PCC Class BB sidewalk repair and 2,000 cu. yds. PCC Class A pavement, alley, & driveway repair, both cut repairs only. Bidding material available from the Procurement Officer, D.C. Sealed bids to be opened in the Procurement Office at 3:00 p.m., November 15, 1985.

Your bill for this advertising order should be submitted on the "Public Voucher for Advertising" form, which is printed on the reverse of this form, immediately after the last publication of the advertisement. If copies of the printed advertisement are not available, complete the affidavit provided on the voucher. Submit the voucher and a copy of the printed advertisement to:
United States Environmental Protection Agency
Financial Operations Section 5MF-14
230 S. Dearborn St.
Chicago, Illinois 60604

IMPORTANT

Charges for advertising when a cut, matrix, stereotype or electrotype is furnished will be based on actual space used and no allowance will be made for shrinkage.

In no case shall the advertisement extend beyond the date and edition stated in this order.

Westefor 886-7450
PUBLIC VOUCHER FOR ADVERTISING

DEPARTMENT OR ESTABLISHMENT, BUREAU OR OFFICE

U. S. Environmental Protection Agency Region V Waste Mgmt. Div

PLACE VOUCHER PREPARED

230 S. Dearborn St. Chicago, Illinois 60604

DATE PREPARED

8/15/1984

For Agency Use Only

VOUCHER NUMBER

SCHEDULE NUMBER

PAID BY

NAME OF PUBLICATION

Cincinnati Enquirer

NAME OF PUBLISHER OR REPRESENTATIVE

ADDRESS (Street, room number, city, State, and ZIP code)

800 Broadway
 Cincinnati, Ohio 45202

Contact: Mary Washington
 (513) 721-2700

CHARGES

TYPEFACE		(size of type)	(inch, square, word, or folio)	
		POINT PER		
Line Rates		NUMBER OR LINES (Indicate counted or space)	COST PER LINE	TOTAL COST
	FIRST INSERTION		\$	\$
	ADDITIONAL INSERTIONS GIVE NUMBER ▶			
	TOTAL			\$
Other Rates		NUMBER OF UNITS (Indicate inch, square, word, folio)	COST PER UNIT	TOTAL COST
	FIRST INSERTION		\$	\$
	ADDITIONAL INSERTIONS GIVE NUMBER ▶			
	TOTAL			\$
Attach one copy of advertisement (including upper and lower rules) to each copy of voucher here. If copy is not available sign the following affidavit.			TOTAL LINE RATES AND OTHER RATES	
			LESS DISCOUNT AT %	
			BALANCE DUE	\$
			VERIFIED (Initials)	

AFFIDAVIT

This represents a true billing for the attached advertising order, with specifications and copy, which has been completed.

SIGNATURE OF PUBLISHER OR REPRESENTATIVE

TITLE

DATE

FOR AGENCY USE ONLY

ADVERTISEMENT PUBLISHED IN	DATE PUBLISHED
I certify that the advertisement described above appeared in the named publication and that this account is correct and eligible for payment.	
SIGNATURE AND TITLE OF CERTIFYING OFFICER	DATE
SIGNATURE AND TITLE OF AUTHORIZING OFFICER	DATE
ACCOUNTING CLASSIFICATION	PAID BY CHECK NUMBER
Estimate: \$375.00 QTN 322 4A4E05 \$002 6840200 2540	

If the ability to certify and authority to approve are combined in one person enter "N/A" (not applicable) here.

PUBLIC NOTICE

The U.S. Environmental Protection Agency (U.S. EPA) has received a certification of change in status from each of the following nine facilities:

1. Airmatic Allied, Inc., 185 Park Dr., Wilmington, Ohio
2. Inmont Corporation, 1720 Dana Ave., Cincinnati, Ohio
3. Carboline Company, 125 Fairgrounds Rd., Xenia, Ohio
4. GMC-Fisher Body, Hamilton Plant, 4400 Dixie Hwy., Fairfield, Ohio
5. GMC-Delco Products Division, 2000 Forrer Blvd., Dayton, Ohio
6. Fram Corporation, P.O. Box 100, Greenville Plant, Greenville, Ohio
7. Procter & Gamble Company, Ivorydale Plant, 5201 Spring Grove Ave., Cincinnati, Ohio
8. Inmont Corporation, State Road 571 East, Greenville, Ohio
9. Radium Petroleum Company, dba Keenan Oil Company, 2350 Seymour Ave., Cincinnati, Ohio

These facilities were storing waste considered hazardous under Federal law. This action will change the status of these facilities from storage facilities storing for more than 90 days to generators storing for fewer than 90 days (per 40 CFR 262.34). The status change for these facilities was effected by removing all hazardous waste stored for longer than 90 days, and by limiting the present accumulation period to fewer than 90 days.

The certifications of change in status were submitted to qualify for generator only status under the Resource Conservation and Recovery Act of 1976, as amended. U.S. EPA requires such certifications when facilities request a change in status from storage facilities to generators.

The certifications and related background materials are available to the public at U.S. EPA Waste Management Branch, 230 S. Dearborn, 13th Floor, Chicago, Illinois, (312) 886-7450, from 8:30 a.m. to 4:30 p.m. Monday through Friday. These materials may also be seen at the Ohio Environmental Protection Agency - Southwest District Office, 7 E. Fourth St., Dayton, Ohio, (614) 466-6450, during regular business hours.

Public comments concerning any of these nine changes in status are requested by U.S. EPA and must be postmarked on or before September 26, 1984. Please send comments to:

United States Environmental Protection Agency
Region V
RCRA Activities
P.O. Box A3587
Chicago, Illinois 60690

Attention: Gary M. Westefer



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY

REGION V
111 West Jackson Blvd.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:
RCRA ACTIVITIES

MAY 5 1982

Robert Fritz, Environmental Manager
Procter and Gamble Company
5201 Spring Grove Avenue
Cincinnati, Ohio 45217

RE: Interim Status Acknowledgement USEPA ID No. OHD 092 818 368
FACILITY NAME: PROCTER & GAMBLE COMPANY THE

Dear Mr. Fritz:


This is to acknowledge that the U.S. Environmental Protection Agency (USEPA) has completed processing your Part A Hazardous Waste Permit Application. It is the opinion of this office that the information submitted is complete and that you, as an owner or operator of a hazardous waste management facility, have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. However, should USEPA obtain information which indicates that your application was incomplete or inaccurate, you may be requested to provide further documentation of your claim for Interim Status. Our opinion will be reevaluated on the basis of this information.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265, or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The printout enclosed with this letter identifies the limit(s) of the process design capacities your facility may use during the interim status period. This information was obtained from your Part A Permit application. If you wish to handle new wastes, to change processes, to increase the design capacity of existing processes, or to change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

As stated in the first paragraph of this letter, you have met the requirements of 40 CFR Part 122.23; your facility may operate under interim status until such time as a permit is issued or denied. This will be preceded by a request from this office or the State (if authorized) for Part B of your application. Please contact Arthur Kawatachi of my staff at (312) 886-7449, if you have any questions concerning this letter or the enclosure.

Sincerely yours,


Karl J. Klepitsch, Jr., Chief
Waste Management Branch

Enclosure

cc: R. M. Womack, V.P.

 5/3/82

DW 5/4/82

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: September 27, 1984

SUBJECT: Changes in Status, State of Ohio

FROM: Gary M. Westefer *Gmw*
RAIU

TO: Becky Strom
STU#2

The following are the closing dates for the Changes in Status for the State of Ohio. No comments have been received on the closures as of this date.

Eton-Colby Chemical Company, Columbus, September 24, 1984

Columbus Products Company, Columbus, September 24, 1984

Toledo- Edison Company:

Acme Generating Station, Toledo

Bay Shore Generating Station, Oregon

Delaware Operations Center, Toledo

Davis -Besse Nuclear Power Station, Oak Harbor

All four facilities close
September 24, 1984

Airmatic Allied, Inc., Wilmington, September 26, 1984

Inmont Corporation, Cincinnati, September 26, 1984

Carboline Company, Xenia, September 26, 1984

GMC-Fisher Body, Fairfield, September 26, 1984

GMC-Delco Products, Dayton, September 26, 1984

Fram Corporation, Greenville, September 26, 1984

Procter & Gamble Co., Cincinnati, September 26, 1984 ✓

Inmont Corporation, Greenville, September 26, 1984

Radium Petroleum co., Cincinnati September 26, 1984



THE PROCTER & GAMBLE COMPANY

IVORYDALE PLANT
5201 SPRING GROVE AVENUE
CINCINNATI, OHIO 45217

September 7, 1983

RECEIVED

AUG 14 1984

WMD-RAIU
EPA, REGION V

Mr. James Flautt
Ohio EPA
Division of Hazardous Materials Management
Permits and Manifest Records Section
P. O. Box 1049
361 E. Broad Street
Columbus, Ohio 43215

04D 092 818368 G.TSD, PA

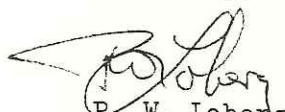
Dear Mr. Flautt:

This letter is official notification that the Procter & Gamble Company has closed its hazardous waste storage facility identified with permit number 05-31-0249. We formally request withdrawal of this permit.

Our hazardous waste generation is infrequent and of such low volume that we are able to dispose of it in less than 90 days or store it at other permitted storage facilities in all cases. Prior to September 8, 1982, all hazardous waste was removed from this facility to other permitted storage or disposal facilities. An informal notification of that fact was made to the Ohio EPA at that time.

If any other correspondence or communication is required regarding this subject, please notify Robert Fritz, Environmental Control Manager.

Sincerely,


P. W. Lobeng
Ivorydale North Plant Manager

RJF:as
Attachment

RECEIVED
OHIO EPA

SEP 12 1983

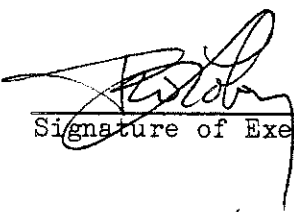
DIV. HAZARDOUS
MATERIALS MANAGEMENT

CERTIFICATION STATEMENT

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Permit Appl. No. 05-31-0249

Procter & Gamble Company
Facility Name


Signature of Executive Officer

Plant Manager
Title

Date

9/8/83

RECEIVED
OHIO EPA
SEP 12 1983
DIV. HAZARDOUS
MATERIALS MANAGEMENT

REC'D EGS

FEB 11 1986



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

SHS-JCK-13

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

U.S. EPA ID #: OHDO92818368

PROCTER & GAMBLE COMPANY THE
5201 SPRING GROVE AVE
CINCINNATI

OH 45217

RE: Hazardous Waste Permit Application

Dear Permit Applicant:

As you know, you have previously submitted Part A of the Resource Conservation and Recovery Act (RCRA) permit application for the above-referenced facility. Timely submission of "the Part A" has allowed most hazardous waste management facilities to continue to operate under RCRA "interim status" (or the State program equivalent), while complying with applicable technical and record-keeping standards.

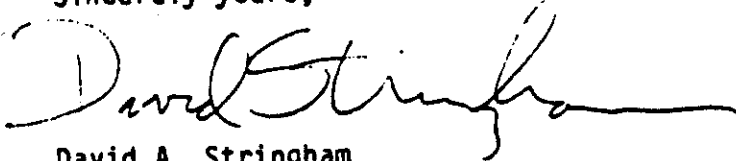
On November 8, 1984, the Hazardous and Solid Waste Amendments of 1984 (the 1984 Amendments) were enacted to modify RCRA. Under the 1984 Amendments, all RCRA permits issued after the date of enactment must provide for corrective action for all releases of hazardous waste or hazardous waste constituents from any solid waste management unit, regardless of the time at which waste was placed in the unit. In addition, all (interim status facilities) are subject to corrective action requirements, regardless of whether they have 1) submitted a Part B application, 2) submitted a closure plan, 3) reverted to generator status only, 4) actually closed, or 5) none of these. Unless our Agency has formally terminated the facility's interim status, the corrective action requirements apply. Please note that both hazardous and non-hazardous waste can meet the definition of solid waste under 40 CFR 261.2 (or the State regulation equivalent).

We must determine whether releases of hazardous waste or hazardous waste constituents have ever occurred at the facility site. If they have, we must ensure that corrective actions either have been taken or will be taken to eliminate threats to public health or the environment. An important element in our decision process is the information that you provide on the enclosed certification statement. Please read it carefully and either sign it and return it, or return it unsigned with a cover letter of explanation, within 45 days of the date of this letter. At some point in time, public input will be sought to either confirm or deny information you provide, or information we gather on our own, concerning releases and corrective actions.

Please mail your response to the following:

RCRA Activities
Region V
P. O. Box A3587
Attention: ATKJG
Chicago, Illinois 60690

Sincerely yours,

A handwritten signature in cursive script, appearing to read "David Stringham".

David A. Stringham
Chief, Solid Waste Branch

Enclosure

**CERTIFICATION REGARDING POTENTIAL RELEASES FROM
SOLID WASTE MANAGEMENT UNITS**

FACILITY NAME: _____

EPA I.D. NUMBER: _____

LOCATION CITY: _____

STATE: _____

- 1. Are there any of the following solid waste management units (existing or closed) at your facility? NOTE - DO NOT INCLUDE HAZARDOUS WASTE UNITS CURRENTLY SHOWN IN YOUR PART A APPLICATION**

	<u>YES</u>	<u>NO</u>
• Landfill	_____	_____
• Surface Impoundment	_____	_____
• Land Farm	_____	_____
• Waste Pile	_____	_____
• Incinerator	_____	_____
• Storage Tank (Above Ground)	_____	_____
• Storage Tank (Underground)	_____	_____
• Container Storage Area	_____	_____
• Injection Wells	_____	_____
• Wastewater Treatment Units	_____	_____
• Transfer Stations	_____	_____
• Waste Recycling Operations	_____	_____
• Waste Treatment, Detoxification	_____	_____
• Other _____	_____	_____

- 2. If there are "Yes" answers to any of the items in Number 1 above, please provide a description of the wastes that were stored, treated or disposed of in each unit. In particular, please focus on whether or not the wastes would be considered as hazardous wastes or hazardous constituents under RCRA. Also include any available data on quantities or volume of wastes disposed of and the dates of disposal. Please also provide a description of each unit and include capacity, dimensions and location at facility. Provide a site plan if available.**

NOTE: Hazardous wastes are those identified in 40 CFR 261. Hazardous constituents are those listed in Appendix VIII of 40 CFR Part 261.

3. For the units noted in Number 1 above and also those hazardous waste units in your Part A application, please describe for each unit any data available on any prior or current releases of hazardous wastes or constituents to the environment that may have occurred in the past or may still be occurring.

Please provide the following information

- a. Date of release
- b. Type of waste released
- c. Quantity or volume of waste released
- d. Describe nature of release (i.e., spill, overflow, ruptured pipe or tank, etc.)

4. In regard to the prior or continuing releases described in Number 3 above, please provide (for each unit) any analytical data that may be available which would describe the nature and extent of environmental contamination that exists as a result of such releases. Please focus on concentrations of hazardous wastes or constituents present in contaminated soil or groundwater.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the submittal is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. (42 U.S.C. 6902 et seq. and 40 CFR 270.11(d))

Typed Name and Title

Signature

Date

CONTINUING RELEASES AT PERMITTED FACILITIES

Sec. 206 Section 3004 of the Solid Waste Disposal Act is amended by adding the following new subsection after subsection (i) thereof:

"(ii) CONTINUING RELEASES AT PERMITTED FACILITIES—Standards promulgated under this section shall require, and a permit issued after the date of enactment of the Hazardous and Solid Waste Amendments of 1984 by the Administrator or a State shall require, corrective action for all releases of hazardous waste or constituents from any solid waste management unit at a treatment, storage, or disposal facility seeking a permit under this subtitle, regardless of the time at which waste was placed in such unit. Permits issued under section 3005 shall contain schedules of compliance for such corrective action (where such corrective action cannot be completed prior to issuance of the permit) and assurances of financial responsibility for completing such corrective action."

THE PROCTER & GAMBLE COMPANY

IVORYDALE PLANT
3201 SPRING GROVE AVENUE
CINCINNATI, OHIO 45217

September 8, 1982

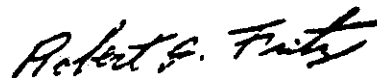
Ohio EPA
Division of Hazardous Materials Management
Permits & Manifest Records Section
P.O. Box 1049
361 E. Broad Street
Columbus, Ohio 43216

Dear Sir:

This letter is notification that the Procter & Gamble Co. has closed its hazardous waste storage facility identified with permit number 05-31-0249. All hazardous waste has been removed from this facility to other permitted storage or disposal facilities. With the closure of this facility an annual permit fee is no longer applicable and the attached fee statement is being returned without remittance.

If any other correspondence or communication is required regarding this subject, please notify me.

Sincerely,



Robert J. Fritz
Environmental Control Manager

Attachment



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

SEP 27 1984

REPLY TO ATTENTION OF:
5HW-13

P.W. Loberg, Plant Manager
The Procter and Gamble Company-
Ivory dale Plant
5201 Spring Grove Avenue
Cincinnati, Ohio 45217

RE: Withdrawal of Part A
FACILITY NAME: The Procter and Gamble Company-
U.S. EPA ID #: OHD 092-818-368

Dear Mr. Loberg:

This Agency has been advised by the Ohio Environmental Protection Agency (Ohio EPA) that the referenced facility is no longer operating as a storage facility under Federal rules. The facility's current status under the Resource Conservation and Recovery Act (RCRA) is that of a generator storing less than 90 days. This letter acknowledges your change in status.

Should you decide in the future to initiate storage of hazardous wastes for greater than 90 days, and such storage is consistent with the original Part A application, you must resubmit a Part A application within 30 days of such initiation.

Should you propose to initiate storage of hazardous wastes in a manner inconsistent with the original Part A application, or to initiate the treatment or disposal of hazardous wastes, you must contact our office and the Ohio EPA at least ten days prior to such initiation. Based on the specifics of the proposed changes, we will advise you whether actual issuance of a permit is a prerequisite for such changes, or whether submittal of Part A and B of your application is sufficient. Failure to resubmit a Part A application, or to contact our office as mentioned above, would subject you to enforcement action. RCRA provides for civil penalties up to \$25,000 per violation.

If you have questions, please contact Rebecca Strom of my staff, at (312) 886-6194, for assistance.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "William H. Miner Sr.", written over the typed name of Karl J. Klepitsch, Jr.

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

cc: Tom Carlisle, Ohio EPA
Cheryl Kaiser, Ohio EPA
Robert Fritz

REC'D INP
OCT 11 1984

DRAFT

JAN 30 1985

MEMORANDUM

SUBJECT: Reauthorization Statutory Interpretation # :
Guidance on Corrective Action for Continuing Releases

FROM: Jack W. McGraw
Acting Assistant Administrator

TO: Addressees

This memorandum is intended to outline EPA's general policy approach to implementing the new provision in the reauthorization amendments on corrective action for continuing releases. The memorandum is comprised of the following ten sections:

- I. Background
- II. Applicability of the New Provision
- III. Scope of the Provision
- IV. Immediate Effect of 3004(u) on Current Permit Actions
- V. Implementation
- VI. Use of Schedules of Compliance and Enforcement After Permit Issuance
- VII. Use of Enforcement Authorities for Corrective Action Before Permit Issuance
- VIII. Continuing Responsibilities of Permittees
- IX. Financial Assurance
- X. State Authorization

I. BACKGROUND

One of the most important provisions of the Solid and Hazardous Waste Amendments of 1984 is the new requirement for corrective action for continuing releases. This provision is established in the new Section 3004(u) of the Act (Section 206 of the Amendments), as follows:

DRAFT

"Standards promulgated under this section shall require, and a permit issued after the date of enactment of the Hazardous and Solid Waste Amendments of 1984 by the Administrator or a State shall require, corrective action for all releases of hazardous waste or constituents from any solid waste management unit at a treatment, storage or disposal facility seeking a permit under this subtitle, regardless of the time at which waste was placed in such unit. Permits issued under section 3005 shall contain schedules of compliance for such corrective action (where such corrective action cannot be completed prior to issuance of the permit) and assurances of financial responsibility for completing such corrective action."

The intent of Congress in establishing this new permit requirement was to correct the perceived shortcoming in the existing RCRA regulations, which allow operating permits to be issued to facilities at which environmental contamination is occurring or has occurred, without the permit addressing that contamination in any way. EPA has interpreted the new provision to mean that all permit applicants must now (a) identify all solid waste management units at the facility, (b) identify any releases that have occurred or are occurring from those units, (c) take appropriate corrective measures to clean up those releases, and (d) demonstrate financial assurance for those corrective measures.

This new authority establishes a new level of control over RCRA facilities, and presents a new technical and administrative challenge to EPA and the States. This policy guidance, in conjunction with the Technical Guidance being developed, is intended to outline the Agency's general policy approach to the new provision, and provide the administrative framework and technical basis for implementing the provision. A series of technical guidance documents is being developed to provide further assistance in implementing these provisions. These guidance documents include:

- o RCRA supplement to CERCLA PA/SI guidance
- o RCRA supplement to CERCLA remedial investigation guidance
- o Guidance on corrective measures for Class I and deep Class IV injection wells
- o Guidance on use of enforcement authorities for corrective measures
- o Guidance on determining trust fund pay-in periods for corrective measures

This memorandum outlines EPA's general policy approach to implementing the new provision on corrective action for continuing releases at facilities seeking a RCRA permit under §3005 of the

Act. It does not apply to RCRA permits by rule under the Clean Water Act, Safe Drinking Water Act, and the Marine Protection, Research and Sanctuaries Act. Guidance on how the new provision may affect, if at all, such permits by rule will be issued at a later date.

In developing the policy guidance in this memorandum, information and viewpoints were solicited from EPA Regional Offices, States, public interest groups, environmental organizations, and industry.

My memorandum of February , 1985 (Reauthorization Statutory Interpretation #3) offered recommendations as to what immediate action should be taken to begin implementation of the continuing release provision. This initial information gathering step should thus already be underway in the Regional Offices.

II. APPLICABILITY OF THE NEW PROVISION

The new 3004(u) requirement applies only to those facilities seeking a RCRA permit. This includes operating permits for existing and new facilities, and post-closure permits. The provision does not impose any requirement on facilities that are operating under interim status, except and until the Part B application for that facility is requested. The provision also does not apply to facilities which have closed or will close under interim status, and which are not subject to post-closure permits. However, corrective measures can be required for those facilities through use of RCRA and/or CERCLA enforcement authorities.

For facilities that were issued RCRA permits prior to November 8, 1984, the requirements of §3004(u) will be imposed on that facility only upon issuance of a new permit once the current permit expires.

It should be understood that the continuing release provision does not affect the current regulatory system for protection of ground-water at "regulated units". For any such unit (landfills, surface impoundments, waste piles and land treatment units that received wastes after July 26, 1982) the facility must demonstrate full compliance with all applicable standards in Subpart F of 40 CFR Part 264 before a permit can be issued for such unit. A schedule of compliance thus cannot be used in the permit to develop a detection monitoring system (§264.98) or a corrective action program for a ground-water release from a regulated unit (§264.100).

A separate provision of the Hazardous and Solid Waste Amendments of 1984 [RCRA §3004(v)] requires EPA to develop regulations to require that corrective action be done beyond the facility boundary as necessary to protect human health and the environment, unless the owner/operator cannot obtain permission to do so. Until those regulations are promulgated, EPA has the authority under §3004(v) to issue corrective action orders to compel owner/operators to perform necessary corrective action beyond the facility property boundary.

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FORM 1 GENERAL		ENVIRONMENTAL PROTECTION AGENCY GENERAL INFORMATION <i>Consolidated Permits Program</i> <i>(Read the "General Instructions" before starting.)</i>		I. EPA I.D. NUMBER 0 H D 0 9 2 8 1 8 3 6 8 3 D	
LABEL ITEMS		PLEASE PLACE LABEL IN THIS SPACE CLOSED FACILITY TSD ONLY		GENERAL INSTRUCTIONS	
EPA I.D. NUMBER				If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete Items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.	
III. FACILITY NAME					
V. FACILITY MAILING ADDRESS					
VI. FACILITY LOCATION					

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK 'X'			SPECIFIC QUESTIONS	MARK 'X'		
	YES	NO	FORM ATTACHED		YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)	X			D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X		X	F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

1 SKIP THE PROCTER & GAMBLE COMPANY

IV. FACILITY CONTACT

A. NAME & TITLE (last, first, & title)		B. PHONE (area code & no.)	
2 FRITZ, ROBERT - ENVIRON. MGR.		513 763 5633	

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX		
3 5201 SPRING GROVE AVE.		
B. CITY OR TOWN	C. STATE	D. ZIP CODE
4 CINCINNATI	OH	45217

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER			
5 5201 SPRING GROVE AVE.			
B. COUNTY NAME			
HAMILTON			
C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE (if known)
6 CINCINNATI	OH	45217	061

VIII. OPERATOR INFORMATION

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)

E. STREET OR P.O. BOXF. CITY OR TOWN

X. EXISTING ENVIRONMENTAL PERMITS

B. UIC (Underground Injection of Fluids)

C. RCRA (Hazardous Wastes)

XI. MAP

XII. NATURE OF BUSINESS (provide a brief description)

XIII. CERTIFICATION (see instructions)

B. SIGNATURE

C. DATE SIGNED

COMMENTS FOR OFFICIAL USE ONLY

EPA Form 3510-1 (6-80)

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FORM 3 RCRA		ENVIRONMENTAL PROTECTION AGENCY HAZARDOUS WASTE PERMIT APPLICATION Consolidated Permits Program (This information is required under Section 3005 of RCRA.)	I. EPA I.D. NUMBER														
			F O H D 0 9 2 8 1 8 3 6 8 3 1														

FOR OFFICIAL USE ONLY										COMMENTS				
APPLICATION APPROVED					DATE RECEIVED (yr., mo., & day)									
23					24					20				

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION (place an "X" below and provide the appropriate date)

☒ 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)

☐ 2. NEW FACILITY (Complete item below.)

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)

YR.	MO.	DAY
8	0	1

FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

YR.	MO.	DAY

B. REVISED APPLICATION (place an "X" below and complete Item I above)

☐ 1. FACILITY HAS INTERIM STATUS

☐ 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES - CODES AND DESIGN CAPACITIES

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.

1. AMOUNT - Enter the amount.
2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS

PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or inciner- ators. Describe the processes in the space provided; Item III-C.)	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS PER HOUR	W
GALLONS PER HOUR	E
LITERS PER HOUR	H

UNIT OF MEASURE	UNIT OF MEASURE CODE
ACRE-FEET	A
HECTARE-METER	F
ACRES	B
HECTARES	Q

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

S T/A C																									
C D U P 3 1																									
1 2 13 14 15																									
LINE NUMBER	A. PRO- CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY										FOR OFFICIAL USE ONLY	LINE NUMBER	A. PRO- CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY										FOR OFFICIAL USE ONLY
		1. AMOUNT (specify)					2. UNIT OF MEAS- URE (enter code)								1. AMOUNT					2. UNIT OF MEAS- URE (enter code)					
16 - 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32																									
X-1	S 0 2	600					G						5												
X-2	T 0 3	20					E						6												
1	S 0 1	3500					G						7												
2	S 0 1	5000					G						8												
3													9												
4													10												
16 - 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32																									

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE CODE
POUNDS. P
TONS. T

METRIC UNIT OF MEASURE CODE
KILOGRAMS. K
METRIC TONS. M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES**1. PROCESS CODES:**

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

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IV. DESCRIPTION OF HAZARDOUS WASTE (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)

S	F	0	H	D	0	9	2	8	1	8	3	6	8	3	6
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

FGA/SS

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

FGA/SS

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

3	9	1	0	0	30
65	66	67	68	69	71

 300

LONGITUDE (degrees, minutes, & seconds)

0	8	4	3	0	15
72	74	75	76	77	79

 150

VIII. FACILITY OWNER

☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code & no.)

3. STREET OR P.O. BOX												4. CITY OR TOWN												5. ST.				6. ZIP CODE			


IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

R. M. WOMACK, VICE PRESIDENT
MANUFACTURING, U.S.

B. SIGNATURE



C. DATE SIGNED

11/14/80

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

B. SIGNATURE

C. DATE SIGNED



OTHER ENVIRONMENTAL PERMITS

STATE EPA AIR EMISSION PERMITS

1431390903B001	1431390903P028
1431390903B008	1431390903P029
1431390903B009	1431390903P030
1431390903B016	1431390903R001
1431390903B018	1431392212B001
1431390903B021	1431392212B002
1431390903B022	1431392213B001
1431390903P001	1431392214B001
	1431392214B002
1431390903P003	
1431390903P004	
1431390903P005	
1431390903P006	
1431390903P007	
1431390903P008	
1431390903P009	
1431390903P010	
1431390903P011	
1431390903P012	
1431390903P013	
1431390903P014	
1431390903P015	
1431390903P016	
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1431390903P018	
1431390903P019	
1431390903P020	
1431390903P021	
1431390903P022	
1431390903P023	
1431390903P024	
1431390903P025	
1431390903P026	
1431390903P027	



OHD092818368

7 1/2 MINUTE SERIES MAP
PUBLISHED BY THE
U.S. GEOLOGICAL SURVEY
SCALE: 1"=24000"
LATITUDE=39° 10 min 30 sec.
LONGITUDE=84° 30 min 15 sec.

EPA I.D. No.

OHD092818368



STORAGE #1



STORAGE #2



STORAGE #2

HAZARDOUS WASTE STORAGE FACILITIES
TAKEN ON 10/24/80

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Dale Lawrence, Operations Manager
Procter & Gamble Company
5299 Spring Grove Avenue
Cincinnati, Ohio 45217

Re: Procter & Gamble Company

U.S. EPA IP Nos.: OHIO 041-705-489
OHIO 042-818-368 ✓

Dear Mr. Lawrence:

The enclosed financial instruments--naming the United States Environmental Protection Agency as the beneficiary--were submitted for the referenced hazardous waste management facilities. This is required by the Resource Conservation and Recovery Act to ensure that funds are available to cover costs of closure and post-closure activities, should the facilities cease operation. Closure and post-closure activities are done to clean up sites to leave them environmentally safe.

As part of the process to transfer hazardous waste management programs to the States, the Ohio Environmental Protection Agency has been authorized to administer the financial responsibility program. This means that new financial instruments--naming the Ohio Environmental Protection Agency as the beneficiary--must be submitted to the State; consequently, we consent to the termination of the present financial instruments.

The new financial instruments--naming the Ohio Environmental Protection Agency as the beneficiary--can be established so that they will satisfy future Federal permit requirements for the facilities. This should result in savings for the facilities because it avoids having both a Federal and a State financial instrument for the same facilities.

For details, please refer to the following regulations: Ohio EPA requirements--Ohio Administrative Code Rule 3745 for closure, post-closure, liability, and instrument wording; Federal Permit requirements--Resource Conservation and Recovery Act (RCRA) as amended, Section 3004 (42 USC 66924), Title 40 of the Code of Federal Regulations (40 CFR 5264.149); State authorization requirements--RCRA Section 3006 (42 USC 66926).

Please consult with, and submit the new financial instruments to Ms. Debbie Tegtmeyer, The State of Ohio EPA, Division of Hazardous Materials Management, 361 E. Broad Street, Columbus, Ohio 43215, at (614) 462-6358.

Sincerely,

Basil G. Constantelos, Director
Waste Management Division

Enclosures: Trust Agreement
Insurance Certificate

cc: Debbie Tegtmeyer, Ohio EPA

bcc: Part A File
Part B File

5HW-13:C. Slaustas:jt:3/15/84

	TYPIST	AUTHOR	STU #1 CHIEF	STU #2 CHIEF	STU #3 CHIEF	
INITIALS	<i>jt</i>	<i>CS</i>		<i>DJB</i>		<i>L.A.</i> <i>3/14/84</i>
DATE	<i>3/15/84</i>	<i>3/15/84</i>		<i>3/15/84</i>		<i>W.H.W.</i> <i>3/16/84</i> <i>K.K.</i> <i>3/16/84</i> <i>D.G. Adams</i> <i>3/20/84</i>



SPECIAL POWER
OF ATTORNEY

SAFECO INSURANCE COMPANY OF AMERICA
HOME OFFICE: SAFECO PLAZA
SEATTLE, WASHINGTON 98185

No. 6550

KNOW ALL BY THESE PRESENTS:

That **SAFECO INSURANCE COMPANY OF AMERICA**, a Washington corporation, does hereby appoint

-----ROBERT KOCH, Cincinnati, Ohio-----

its true and lawful attorney(s)-in-fact, with full authority to execute on behalf of the company bonds for THE PROCTER & GAMBLE COMPANY and Subsidiaries of THE PROCTER & GAMBLE COMPANY in amounts or penalties not exceeding the sum of \$1,000,000.

and to bind **SAFECO INSURANCE COMPANY OF AMERICA** thereby as fully as if such instruments had been duly executed by its regularly elected officers at its home office.

IN WITNESS WHEREOF, **SAFECO INSURANCE COMPANY OF AMERICA** has executed and attested these presents

this 3rd day of March, 1982.

CERTIFICATE

Extract from the By-Laws of **SAFECO INSURANCE COMPANY OF AMERICA**:

"Article V, Section 13. — FIDELITY AND SURETY BONDS . . . the President, any Vice President, the Secretary, and any Assistant Vice President appointed for that purpose by the officer in charge of surety operations, shall each have authority to appoint individuals as attorneys-in-fact or under other appropriate titles with authority to execute on behalf of the company fidelity and surety bonds and other documents of similar character issued by the company in the course of its business . . . On any instrument making or evidencing such appointment, the signatures may be affixed by facsimile. On any instrument conferring such authority or on any bond or undertaking of the company, the seal, or a facsimile thereof, may be impressed or affixed or in any other manner reproduced; provided, however, that the seal shall not be necessary to the validity of any such instrument or undertaking."

Extract from a Resolution of the Board of Directors of
SAFECO INSURANCE COMPANY OF AMERICA adopted July 28, 1970.

"On any certificate executed by the Secretary or an assistant secretary of the Company setting out,

- (i) The provisions of Article V, Section 13 of the By-Laws, and
- (ii) A copy of the power-of-attorney appointment, executed pursuant thereto, and
- (iii) Certifying that said power-of-attorney appointment is in full force and effect,

the signature of the certifying officer may be by facsimile, and the seal of the Company may be a facsimile thereof."

I, W.D. Hammersla, Secretary of **SAFECO INSURANCE COMPANY OF AMERICA**, do hereby certify that the foregoing extracts of the By-Laws and of a Resolution of the Board of Directors of this corporation, and of a Power of Attorney issued pursuant thereto, are true and correct, and that both the By-Laws, the Resolution and the Power of Attorney are still in full force and effect.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed the facsimile seal of said corporation

this 1st day of July, 1982

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER.
THIS CERTIFICATE DOES NOT EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES LISTED BELOW.

NAME AND ADDRESS OF AGENCY Walter P. Dolle, Inc. 424 Dixie Terminal Building Cincinnati, Ohio 45202	COMPANIES AFFORDING COVERAGES COMPANY LETTER A Commercial Union Insurance Company COMPANY LETTER B COMPANY LETTER C COMPANY LETTER D COMPANY LETTER E
NAME AND ADDRESS OF INSURED The Procter & Gamble Company 5299 Spring Grove Avenue Cincinnati, Ohio 45217 Facility #OHD061705489	

This is to certify that policies of insurance listed below have been issued to the insured named above and are in force at this time. Notwithstanding any requirement, term or condition of any contract or other document with respect to which this certificate may be issued or may pertain, the insurance afforded by the policies described herein is subject to all the terms, exclusions and conditions of such policies.

COMPANY LETTER	TYPE OF INSURANCE	POLICY NUMBER	POLICY EXPIRATION DATE	Limits of Liability in Thousands (\$000)		
					EACH OCCURRENCE	AGGREGATE
(A)	GENERAL LIABILITY	C-Y-9001-330	7/1/83	BODILY INJURY	\$	\$
	PROPERTY DAMAGE			\$	\$	
	BODILY INJURY AND PROPERTY DAMAGE COMBINED			\$ 1,000	\$ 2,000	
	PERSONAL INJURY			\$		
	AUTOMOBILE LIABILITY			BODILY INJURY AND PROPERTY DAMAGE COMBINED	\$	\$
	WARRANTY LIABILITY			BODILY INJURY AND PROPERTY DAMAGE COMBINED	\$	\$
	EMPLOYERS' COMPENSATION AND EMPLOYERS' LIABILITY			STATUTORY	\$	\$
	OTHER					

DESCRIPTION OF OPERATIONS LOCATIONS/VEHICLES

Hazardous Waste Liability Coverage is Provided, as described in the Federal Register, 4/16/82, Paragraph 264.157J

Cancellation: Should any of the above described policies be cancelled before the expiration date thereof, the issuing company will endeavor to mail 30 days written notice to the below named certificate holder, but failure to mail such notice shall impose no obligation or liability of any kind upon the company.

NAME AND ADDRESS OF CERTIFICATE HOLDER

Regional Administrator
U.S. Environmental Protection Agency, Region V
230 South Dearborn Street
Chicago, IL 60604

DATE ISSUED

7/2/82

AUTHORIZED REPRESENTATIVE

Date bond executed: 7/1/82

Effective Date: 7/1/82

Principal: The Procter & Gamble Company
301 East Sixth Street
Cincinnati, OH 45202

Type of Organization: Corporation

State of Incorporation: Ohio

Surety(ies): Safeco Insurance Company of America

EPA Identification Number, name and address of each facility and if more than one facility is covered by this bond, the amount of the penal sum for each facility:

<u>OHDO92818368</u>	The Procter & Gamble Company
	5201 Spring Grove Ave.
	Cincinnati, OH 45217

Total penal sum of bond: \$ 20,600.00

Know all men by these presents, That we, the Principal and Surety(ies) hereto are firmly bound to the U.S. Environmental Protection Agency (hereinafter called EPA), in the above penal sum for the payment of which we bind ourselves, our heirs, executors, administrators, successors, and assigns, jointly and severally; provided that, where the Surety(ies) are corporations acting as co-sureties, we, the Sureties, bind ourselves in such sum "jointly and severally" only for the purpose of allowing a joint action or actions against any or all of us, and for all other purposes each Surety binds itself, jointly and severally with the Principal, for the payment of such sum only as is set forth opposite the name of such Surety, but if no limit of liability is indicated, the limit of liability shall be the full amount of the penal sum.

Whereas, said Principal is required to have an EPA permit or permits, or interim status, in order to own or operate the hazardous waste management facility(ies) identified above, and

Whereas said Principal is required to provide financial assurance for closure of the facility(ies) as a condition of the permit(s) or interim status, and

Whereas said Principal shall establish a standby trust fund as specified by 40 CFR 264.143 or 40 CFR 265.143,

Now, therefore the conditions of the obligation are such that if the Principal shall faithfully, for the facility(ies) identified above, at least 60 days before the beginning of final closure, fund the standby trust fund in an amount equal to the penal sum,

Or, if the Principal shall fund the standby trust fund in such an amount within 15 days after an order to begin closure in accordance with Subpart G of 40 CFR Parts 264 and 265 is issued by an EPA Regional Administrator or by a U.S. district court pursuant to Section 3008, 7002, or 7003 of the Resource Conservation and Recovery Act, as amended, or within 15 days after a notice of termination of the permit(s) or interim status pursuant to 40 CFR Part 124,

Or, if the Principal shall provide alternate financial assurance as specified in 40 CFR 264.143 or 40 CFR 265.143 within 90 days after the date notice of cancellation is received by a Regional Administrator, then this obligation will be null and void, otherwise it is to remain in full force and effect.

The Surety(ies) shall be liable on this bond obligation only when the Principal has failed to fulfill the conditions described above. Upon notification by an EPA Regional Administrator that the Principal has failed to perform as warranted by this bond, the Surety(ies) shall place funds in the amount of the penal sum into the standby trust fund as directed by the EPA Regional Administrator.

The Liability of the Surety(ies) shall not be discharged by any payment or succession of payments hereunder, unless and until such payment or payments shall amount in the aggregate to the penal sum of the bond, but in no event shall the obligation of the Surety(ies) hereunder exceed the amount of said penal sum.

The Surety(ies) may cancel the bond by sending written notice of cancellation to the owner or operator and to the EPA Regional Administrator(s) for the Region(s) in which the facility(ies) is (are) located, provided, however, that cancellation cannot occur during the 120 days beginning on the date of receipt of the notice of cancellation by the Regional Administrator(s) as shown on the signed return receipt(s).

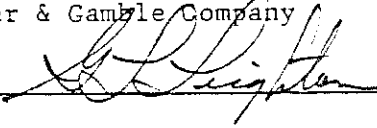
The Principal may terminate this bond by sending written notice to the Surety(ies), provided, however, that no such notice shall become effective until the Surety(ies) receive(s) written authorization for termination of the bond by the Regional Administrator(s) of the EPA Region(s) in which the bonded facility(ies) is (are) located.

Principal and Surety(ies) hereby agree to adjust the penal sum of the bond yearly so that it equals the adjusted closure cost estimate(s), provided that the amount of the cost estimate(s) does (do) not increase by more than 20 percent in any one year, and no decrease in the penal sum takes place without the written permission of the Regional Administrator(s).

In witness whereof, the Principal and Surety(ies) have executed this Financial Guarantee Bond and have affixed their seals on the date set forth above.

The persons whose signatures appear below hereby certify that they are authorized to execute this surety bond on behalf of the Principal and Surety(ies) and that the wording of this surety bond is identical to the wording specified in 40 CFR 265.151(b).

Principal: The Procter & Gamble Company

Signature(s): 

Name(s) and Title(s): G. L. Leighton, Manager, Insurance Department

Corporate Seal:

Corporate Surety(ies)

Name and address: Safeco Insurance Company of America
Safeco Plaza, Seattle, Wash. 98185 (Home Office)

State of incorporation: Washington

Liability Limit: \$18,138,000.00

Signature(s): 

Name(s) and Title(s): Robert Koch, Attorney-in-Fact

Corporate Seal:

Bond premium: \$41.00

NAME AND ADDRESS OF AGENCY

Walter P. Dolle, Inc.
424 Dixie Terminal Building
Cincinnati, Ohio 45202

COMPANIES AFFORDING COVERAGES

COMPANY LETTER **A** Commercial Union Insurance Company
COMPANY LETTER **B**
COMPANY LETTER **C**
COMPANY LETTER **D**
COMPANY LETTER **E**

NAME AND ADDRESS OF INSURED

The Procter & Gamble Company
5201 Spring Grove Avenue
Cincinnati, Ohio 45217
Facility #OHD092818368

This is to certify that policies of insurance listed below have been issued to the insured named above and are in force at this time. Notwithstanding any requirement, term or condition of any contract or other document with respect to which this certificate may be issued or may pertain, the insurance afforded by the policies described herein is subject to all the terms, exclusions and conditions of such policies.

COMPANY LETTER	TYPE OF INSURANCE	POLICY NUMBER	POLICY EXPIRATION DATE	Limits of Liability in Thousands (000)		
					EACH OCCURRENCE	AGGREGATE
(A)	GENERAL LIABILITY <input type="checkbox"/> COMPREHENSIVE FORM <input checked="" type="checkbox"/> AUTOMOBILE OPERATIONS <input type="checkbox"/> ELEVATOR AND COLLAPSE (EXCLUDED) <input type="checkbox"/> INTERFERING HAZARD <input type="checkbox"/> PRODUCTS COMPLETED OPERATIONS HAZARD <input type="checkbox"/> CONTRACTORS INSURANCE <input type="checkbox"/> BODILY INJURY AND PROPERTY DAMAGE <input type="checkbox"/> NON-ACCIDENT CONTRACTORS <input type="checkbox"/> AUTOMOBILE INJURY	C-Y-9001-330	7/1/83	BODILY INJURY	\$	\$
	PROPERTY DAMAGE			\$	\$	
	BODILY INJURY AND PROPERTY DAMAGE COMBINED			\$ 1,000	\$ 2,000	
	PERSONAL INJURY				\$	
	AUTOMOBILE LIABILITY <input type="checkbox"/> COMPREHENSIVE FORM <input type="checkbox"/> AUTOMOBILE OPERATIONS <input type="checkbox"/> ELEVATOR AND COLLAPSE <input type="checkbox"/> INTERFERING HAZARD <input type="checkbox"/> PRODUCTS COMPLETED OPERATIONS HAZARD <input type="checkbox"/> CONTRACTORS INSURANCE <input type="checkbox"/> BODILY INJURY AND PROPERTY DAMAGE <input type="checkbox"/> NON-ACCIDENT CONTRACTORS <input type="checkbox"/> AUTOMOBILE INJURY			BODILY INJURY AND PROPERTY DAMAGE	\$	\$
				BODILY INJURY AND PROPERTY DAMAGE	\$	\$
				PROPERTY DAMAGE	\$	\$
				BODILY INJURY AND PROPERTY DAMAGE COMBINED	\$	\$
	BOILER LIABILITY <input type="checkbox"/> COMPREHENSIVE FORM <input type="checkbox"/> OTHER THAN UMBRELLA FORM			BODILY INJURY AND PROPERTY DAMAGE COMBINED	\$	\$
	WORKERS' COMPENSATION and EMPLOYERS' LIABILITY			STATUTORY	\$	\$
	OTHER					

DESCRIPTION OF OPERATIONS LOCATIONS/VEHICLES

Hazardous Waste Liability Coverage is Provided, as described in the Federal Register, 4/16/82, Paragraph 264.157J

Cancellation: Should any of the above described policies be cancelled before the expiration date thereof, the issuing company will endeavor to mail 30 days written notice to the below named certificate holder, but failure to mail such notice shall impose no obligation or liability of any kind upon the company.

NAME AND ADDRESS OF CERTIFICATE HOLDER

Regional Administrator
U.S. Environmental Protection Agency, Region V
230 South Dearborn Street
Chicago, IL 60604

DATE ISSUED

7/2/82

AUTHORIZED REPRESENTATIVE



CERTIFICATE OF INSURANCE

SET TAB STOPS AT ARROWS
ISSUE DATE (MM/DD/YY)

10/1/84

PRODUCER

Walter P. Dolle, Inc.
424 Dixie Terminal Building
Cincinnati, Ohio 45202

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW.

COMPANIES AFFORDING COVERAGE

COMPANY LETTER **A** Commercial Union Insurance Company

COMPANY LETTER **B**

COMPANY LETTER **C**

COMPANY LETTER **D**

COMPANY LETTER **E**

INSURED

The Procter & Gamble Company
5201 Spring Grove Avenue
Cincinnati, Ohio 45217
Facility #OHD092818368

COVERAGES

THIS IS TO CERTIFY THAT POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS, AND CONDITIONS OF SUCH POLICIES.

CO LTR	TYPE OF INSURANCE	POLICY NUMBER	POLICY EFFECTIVE DATE (MM/DD/YY)	POLICY EXPIRATION DATE (MM/DD/YY)	LIABILITY LIMITS IN THOUSANDS		
						EACH OCCURRENCE	AGGREGATE
A	GENERAL LIABILITY	CL CY 9001-365	7/1/83	7/1/86	BODILY INJURY	\$	\$
	<input type="checkbox"/> COMPREHENSIVE FORM				PROPERTY DAMAGE	\$	\$
	<input checked="" type="checkbox"/> PREMISES/OPERATIONS				BI & PD COMBINED	\$ 1,000	\$ 2,000
	<input type="checkbox"/> UNDERGROUND EXPLOSION & COLLAPSE HAZARD				PERSONAL INJURY		\$
	<input type="checkbox"/> PRODUCTS/COMPLETED OPERATIONS						
	<input type="checkbox"/> CONTRACTUAL						
	<input type="checkbox"/> INDEPENDENT CONTRACTORS						
	<input type="checkbox"/> BROAD FORM PROPERTY DAMAGE						
	<input type="checkbox"/> PERSONAL INJURY						
AUTOMOBILE LIABILITY				BODILY INJURY (PER PERSON)	\$		
<input type="checkbox"/> ANY AUTO				BODILY INJURY (PER ACCIDENT)	\$		
<input type="checkbox"/> ALL OWNED AUTOS (PRIV. PASS.)				PROPERTY DAMAGE	\$		
<input type="checkbox"/> ALL OWNED AUTOS (OTHER THAN PRIV. PASS.)				BI & PD COMBINED	\$		
<input type="checkbox"/> HIRED AUTOS							
<input type="checkbox"/> NON-OWNED AUTOS							
<input type="checkbox"/> GARAGE LIABILITY							
EXCESS LIABILITY				BI & PD COMBINED	\$	\$	
<input type="checkbox"/> UMBRELLA FORM							
<input type="checkbox"/> OTHER THAN UMBRELLA FORM							
	WORKERS' COMPENSATION AND EMPLOYERS' LIABILITY				STATUTORY		
					\$	(EACH ACCIDENT)	
					\$	(DISEASE-POLICY LIMIT)	
					\$	(DISEASE-EACH EMPLOYEE)	
	OTHER						

DESCRIPTION OF OPERATIONS/LOCATIONS/VEHICLES/SPECIAL ITEMS

Hazardous Waste Liability Coverage is Provided, as described in the Federal Register, 4/16/82, Paragraph 264.157J

CERTIFICATE HOLDER

Regional Administrator
U.S. Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, Illinois 60604

CANCELLATION

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, THE ISSUING COMPANY WILL ENDEAVOR TO MAIL 30 DAYS WRITTEN NOTICE TO THE CERTIFICATE HOLDER NAMED TO THE LEFT, BUT FAILURE TO MAIL SUCH NOTICE SHALL IMPOSE NO OBLIGATION OR LIABILITY OF ANY KIND UPON THE COMPANY, ITS AGENTS OR REPRESENTATIVES.

AUTHORIZED REPRESENTATIVE

HAZARDOUS WASTE FACILITY LIABILITY ENDORSEMENT

1. This endorsement certifies that the policy to which the endorsement is attached provides liability insurance covering bodily injury and property damage in connection with the insured's obligation to demonstrate responsibility under 40 CFR 264.147 or 265.147. The coverage applies at:

The Procter & Gamble Company

5201 Spring Grove Avenue

Cincinnati, OH 45217

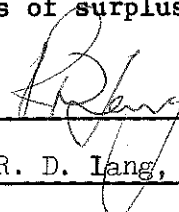
EPA #OHD092818368

for sudden accidental occurrences. The limits of liability are \$1,000,000 each occurrence, and \$2,000,000 annual aggregate, exclusive of legal defense costs.

2. The insurance afforded with respect to such occurrences is subject to all of the terms and conditions of the policy; provided, however, that any provisions of the policy inconsistent with subsections (a) through (e) of this Paragraph are hereby amended to conform with subsections (a) through (e):
- (a) Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy to which this endorsement is attached.
 - (b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147(f) or 265.147(f).
 - (c) Whenever requested by a Regional Administrator of the U.S. Environmental Protection Agency (EPA), the Insurer agrees to furnish to the Regional Administrator a signed duplicate original of the policy and all endorsements.
 - (d) Cancellation of this endorsement, whether by the Insurer or the insured, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is (are) located.
 - (e) Any other termination of this endorsement will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is (are) located.

Attached to and forming part of Policy No. CLCY9001-365 issued by Commercial Union Insurance Company, herein called the Insurer, of Boston, Massachusetts, to The Procter & Gamble Company of Cincinnati, Ohio, this 16 day of October, 1984. The effective date of said policy is the 1 day of July, 1983.

I hereby certify that the wording of this endorsement is identical to the wording specified in 40 CFR 264.151(i) as such regulation was constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess of surplus lines insurer, in one or more States.



R. D. Lang, President, Walter P. Dolle, Inc.
Name and Title

Authorized Representative of:
Commercial Union Insurance Cos.

424 Dixie Terminal Bldg., Cincinnati, OH 45202



NOTICE OF
CANCELLATION OF BOND

SAFECO INSURANCE COMPANY OF AMERICA
GENERAL INSURANCE COMPANY OF AMERICA
FIRST NATIONAL INSURANCE COMPANY
OF AMERICA
HOME OFFICE: SAFECO PLAZA
SEATTLE, WASHINGTON 98185

To: U.S. Environmental Protection Agency, Region V
(OBLIGEE'S NAME/ADDRESS)

230 South Dearborn Street

Chicago, Illinois 60604

04D 099
026
833

You are hereby notified that SAFECO INSURANCE COMPANY OF AMERICA, Surety upon

Type of Bond: Financial guarantee bond for closure-Hazardous Waste

Bond No. 4485593

dated effective 7-1-82
(MONTH, DAY, YEAR)

on behalf of The Procter & Gamble Company
(PRINCIPAL'S NAME/ADDRESS)
P.O. Box 599

Cincinnati, Ohio 45202

368
531
2

desires to cancel and does hereby cancel said bond in accordance with the cancellation provisions contained therein or in applicable laws or regulations. This notice is

mailed to you on 11-13-86
(MONTH, DAY, YEAR)

and is effective One Hundred twenty (120) days after receipt of this notice.

SAFECO INSURANCE COMPANY OF AMERICA

By: Suzanne B. Blum
Suzanne B. Blum Attorney-in-Fact

Cancellation Acknowledged: (PLEASE SIGN AND RETURN THE DUPLICATE OF THIS NOTICE)

By: _____

Dated: _____
(MONTH, DAY, YEAR)



RECEIVED
NOV 18 1986
FINANCIAL ANALYST
REGION V

05-31-0249

Ohio EPA

Re: Hamilton County
Hazardous Materials
Proctor & Gamble (Ivorydale)
OHD 092818368
HW 05-31-0249

Mr. Robert Fritz
Proctor & Gamble
Ivorydale Plant
5201 Spring Grove Avenue
Cincinnati, Ohio 45217

April 29, 1983

Dear Mr. Fritz:

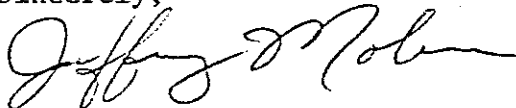
On 28 April 1983, I did a brief inspection to insure correction of the physical violation found on 15 April 1983.

The sign violation was corrected. The material submitted on 22 April 1983 corrects the other violation listed in my 18 April 1983 letter. Your facility is in compliance with Federal and State hazardous waste rules for generators.

If you have any further questions, please call me at (513) 461-4670.

Compliance with applicable parts of 40 CFR and OAC 3745 is required by the Federal and State EPA authorities. Failure to list specific deficiencies in this communication does not relieve you from the responsibility of complying with all applicable regulations.

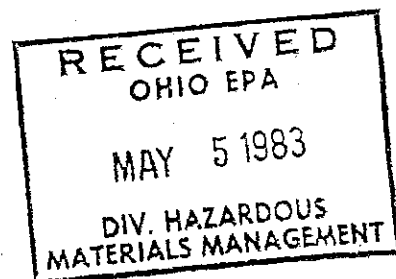
Sincerely,



Jeffrey Moler
Hazardous Materials Management

JM/dkp

cc: Ken Westlake, USEPA, Region V
cc: Paula Cotter, DHMM, SE&S, CO



Regional Administrator
U.S. Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, Illinois 60604

1433-6C OK

O. WMD
CC: RF

Re: 40 CFR Section 268.8(a)(1) Demonstration and Certification
Generator Name: Procter and Gamble, IDP
Address: 5201 Spring Grove Ave, Cincinnati, Ohio 45217
EPA ID#: OHDO92818368
"First Third Waste Code Involved: U213.

RECEIVED
WMD RCRA
RECORD CENTER

2/8/93

This demonstration and certification is submitted pursuant to 40 CFR Section 268.8(a)(1).

It is submitted in connection with a hazardous waste generated at this facility. This waste consists of a small quantity of the "First & Second Third" "soft-hammer" waste listed above.

We have review this waste internally for another use. We have also had the two local University Chemistry Department review this for their use. None of this produced another beneficial use. Our contacts were; 2/19/90, Dr. Barbara Hopkins, Xavier University, 3800 Victory Parkway, Cincinnati, OH 45207, phone (513)745-2063 & 2/19/90, Dr. Frank Mendraiski, University of Cincinnati, Mail Location 172, Cincinnati, OH 45221-0172, phone (513)556-9300.

In considering recovery of the material, the small quantities were not believed practical to commercially process.

We have determined that incineration is a practically available treatment for this waste. The small quantity of waste involved will be "lab-packed" and incinerated in a RCRA authorized incineration facility. Incineration will destroy the hazardous constituents. The facility we have contact with to incinerate the waste is:

Rollins Environmental Services (LA) Inc.
Baton Rouge, LA 70897
EPA ID#: LAD20395127

In making the decision to incinerate this waste, we contacted Mr. Russ Davis, Rollins Environmental Services, 3985 Research Park Drive, Ann Arbor, MI, 48108, (313) 761-1389 on 2/19/90.

I certify under penalty of law that the requirements of 40 CFR Section 268.8(a)(1) have been met and that I have contracted to treat my waste (or will otherwise provide treatment) by the practically available technology which yields the greatest environmental benefit, as indicated in my demonstration. I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Date: 3.2.90

OFFICE OF RCRA
WASTE MANAGEMENT DIVISION
EPA REGION V

MAR 3 - 1990

RECEIVED

Very truly yours,

Doan Stewart

RECEIVED

MAR 08 1990

OFFICE OF REGIONAL ADMINISTRATOR

Land Ban Certification
1990

D. Corrective
Action



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

RECEIVED
WMD RCRA
RECORD CENTER

MAY 06 1993

Comp

REPLY TO THE ATTENTION OF:

HRE-8J

April 21, 1993

Mr. Peter Dawson
Environmental Engineer
Procter & Gamble
Ivorydale Manufacturing Complex
5201 Spring Grove Avenue
Cincinnati, Ohio 45217

Re: Visual Site Inspection
Procter & Gamble
Ivorydale Manufacturing Complex
Cincinnati, Ohio
OHD 092 818 368

Dear Mr. Dawson:

The U.S. Environmental Protection Agency is enclosing a copy of the final Preliminary Assessment/Visual Site Inspection (PA/VSI) report for the referenced facility. The executive summary and conclusions and recommendations sections have been withheld as Enforcement Confidential.

If you have any questions, please call Francene Harris at (312) 886-2884.

Sincerely yours,

Kevin M. Pierard, Chief
Minnesota/Ohio Technical Enforcement Section
RCRA Enforcement Branch



Re: Hazardous Waste Activity Status
U.S. EPA I.D. No. OHD092818368 G, PA-3, #
Ohio Permit No. 05-31-0249

April 1, 1985

Robert Fritz
Environmental Control Mgr.
Proctor & Gamble
Ivorydale plant
5201 Spring Grove Ave.
Cincinnati, Ohio 45217

Dear Mr. Fritz:

According to our records, your Ohio Hazardous Waste Installation & Operation Permit has expired. Prior to the expiration of that permit, you had informed and certified to the Ohio EPA that you no longer conducted hazardous waste activity for which a permit was required.

Therefore, this letter is to inform you that, based on the information you had submitted and an investigation by Agency staff, you will maintain the status of a generator only with less than 90 day storage.

You should continue to use the identification number assigned to you by the U.S. EPA for purposes of compliance with the Ohio EPA manifest, recordkeeping and reporting requirements for generators and transporters of hazardous waste as appropriate.

Should you have any questions concerning your current status, please contact the appropriate Ohio EPA District Office (see enclosed list).

Very truly yours,

Thomas E. Crepeau

Thomas E. Crepeau, Manager
Data Management Section
Division of Solid and Hazardous Waste Management

TEC/ds

Enclosure

cc: U.S. EPA, Region V
HWFB
D.O.



U.S. Environmental Protection Agency
Office of Waste Programs Enforcement
Contract No. 68-W9-0006



TES 9

**Technical Enforcement Support
at Hazardous Waste Sites
Zone III
Regions 5,6, and 7**

PRC

PRC Environmental Management, Inc.

PRC Environmental Management, Inc.
233 North Michigan Avenue
Suite 1621
Chicago, IL 60601
312-856-8700
Fax 312-938-0118



**PRELIMINARY ASSESSMENT/
VISUAL SITE INSPECTION**

**PROCTER & GAMBLE
IVORYDALE MANUFACTURING COMPLEX
CINCINNATI, OHIO
OHD 092 818 368**

FINAL REPORT

Prepared for

**U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460**

Work Assignment No.	:	C05087
EPA Region	:	5
Site No.	:	OHD 092 818 368
Date Prepared	:	February 4, 1993
Contract No.	:	68-W9-0006
PRC No.	:	009-C05087OH3H
Prepared by	:	PRC Environmental Management, Inc. (Pete Zelinkas)
Contractor Project Manager	:	Shin Ahn
Telephone No.	:	(312) 856-8700
EPA Work Assignment Manager	:	Kevin Pierard
Telephone No.	:	(312) 886-4448

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Attachment

- A EPA PRELIMINARY ASSESSMENT FORM 2070-12
- B VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS
- C VISUAL SITE INSPECTION FIELD NOTES

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RELEASED
DATE 9/24/88
RIN #
INITIALS WV

~~ENFORCEMENT
CONFIDENTIAL~~

EXECUTIVE SUMMARY

PRC Environmental Management, Inc. (PRC), performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from the solid waste management units (SWMU) at the Procter & Gamble Ivorydale Manufacturing Complex (P&G) in Cincinnati, Ohio. No areas of concern (AOC) were identified at the facility. This summary highlights the results of the PA/VSI and the potential for releases of hazardous wastes or hazardous constituents from the SWMUs identified. In addition, a completed U.S. Environmental Protection Agency (EPA) Preliminary Assessment Form (EPA Form 2070-12) is included in Attachment A to assist in prioritizing RCRA facilities for corrective action.

P&G manufactures and distributes bar soaps, synthetic detergents, and oil-based food products. As a part of the manufacturing process, fatty acids and vegetable oils are hydrolyzed. The facility operates as a generator of hazardous waste with less than 90-day storage. The two permitted hazardous waste storage areas (SWMUs 1 and 2) have not received closure approval from EPA and Ohio Environmental Protection Agency (OEPA). The Hazardous Waste Storage Area (SWMU 1) operated as a greater than 90-day storage area from 1980 to 1983; and as a less than 90-day storage area since 1983. The Former Hazardous Waste Storage Area (SWMU 2) operated as a greater than 90-day storage area from 1980 until late 1981. The facility then began closure activities and submitted a certification of closure to OEPA in 1983. There is no documentation indicating OEPA or EPA acknowledged the closure of the Former Hazardous Waste Storage Area (SWMU 2). Hazardous wastes generated by the facility include waste solvents (F001 and D001) and waste laboratory chemicals (mainly P and U wastes). Nonhazardous wastes generated by the facility include waste tank cleaning sludge, waste oils, flyash, and wastewater. According to P&G representatives, the facility has a large support staff involved in waste management; recycling alternatives for wastes generated are continuously explored.

P&G occupies about 120 acres; about 75 percent of this area is indoors. The Procter & Gamble Company began manufacturing soap at the P&G location in 1885. Over the years, soap manufacturing operations have continued, along with the production of various oil-based foods. Additions and upgrades have occurred continuously over the years. The facility contains numerous bulk storage tanks used for food product and soap storage.

The P&G facility is located in a highly industrialized area of western Cincinnati and is completely surrounded by other industrial facilities. The nearest residential area is Winton Place, about 2,000 feet east of the P&G facility. About 300 private residences are within 1 mile of the facility. The facility is monitored 24 hours per day by security personnel and is surrounded by a 6-foot-high steel chain-link fence.

~~ENFORCEMENT
CONFIDENTIAL~~

The PA/VSI identified the following six SWMUs:

Solid Waste Management Units

1. Hazardous Waste Storage Area
2. Former Hazardous Waste Storage Area
3. Satellite Accumulation Areas
4. Ash Ponds
5. Dumpster Accumulation Area
6. Fat Traps

RELEASED
DATE 4/26/00
RIN #
INITIALS mt

The potential for all SWMUs at the P&G facility to release hazardous constituents to ground water and on-site soils is low. Over the years, soap and food production at the facility has involved small amounts of hazardous chemicals, and P&G practices sound waste management. The Hazardous Waste Storage Area (SWMU 1) has adequate containment, and the Satellite Accumulation Areas (SWMU 3) are monitored regularly. Area ground water is generally not used as a local drinking water source. Most drinking water in the area is supplied by the City of Cincinnati. The City of Cincinnati draws water from an intake on the Ohio River about 9 miles above the confluence of the Ohio River and Mill Creek. The nearest drinking water well is located about 4 miles northwest and upgradient of the facility in the City of Lockland. There are no drinking water wells downgradient from the P&G facility. The P&G facility receives all water from the City of Cincinnati.

The potential for hazardous releases to surface water is low. The P&G facility has one National Pollutant Discharge Elimination System (NPDES) outfall for releases of storm water discharges and noncontact cooling water. No violations of this permit have been filed against P&G. However, the City of Cincinnati Municipal Sewer District (MSD) has expressed concerns about the efficiency of Fat Traps (SWMU 6) used at the facility to collect fats and oils from wastewater released to the MSD system. P&G is currently upgrading the Fat Traps. The Mill Creek flows through the P&G facility and eventually enters the Ohio River about 6.5 miles south. The Mill Creek is used mainly for storm water drainage from various industrial facilities along its route.

The potential for the facility to release hazardous constituents to air is low. P&G has about 45 air permits, mainly for releases from the hydrolysis process. The facility does not have a history of air permit compliance problems. Local residents occasionally complain about odors in the area. To address this problem, P&G, in conjunction with the other Procter & Gamble facilities in the area, occasionally arranges review boards composed of local residents that attempt to match odors with vapor discharges from the facility. Foul odors have rarely been traced to the

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P&G facility. The area around the facility is highly industrialized, and most companies have air discharges.

PRC recommends the continuation of Fat Trap (SWMU 6) upgrades at the facility. Also, EPA should determine if closure of the Former Hazardous Waste Storage Area (SWMU 2) has been accomplished or is necessary. PRC recommends the facility submit a closure plan for the Hazardous Waste Storage Area (SWMU 1).

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1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. C05087 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has usually exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading or unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release of hazardous waste or constituents to the environment has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where a strong possibility exists that such a release might occur in the future.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility
- Obtain information on the operational history of the facility
- Obtain information on releases from any units at the facility
- Identify data gaps and other informational needs to be filled during the VSI

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA
- Identify releases not discovered during the PA
- Provide a specific description of the environmental setting
- Provide information on release pathways and the potential for releases to each medium
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases

The VSI includes interviewing appropriate facility staff; inspecting the entire facility to identify all SWMUs and AOCs; photographing all visible SWMUs; identifying evidence of releases; making a preliminary selection of potential sampling parameters and locations, if needed; and obtaining additional information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the Procter & Gamble Ivorydale Manufacturing Complex (P&G) (EPA Identification No. OHD 092 818 368) in Cincinnati, Ohio. The PA was completed on March 20, 1992. PRC gathered and reviewed information from the Ohio Environmental Protection Agency (OEPA) and EPA Region 5 RCRA files, the U.S. Geological Survey (USGS), and U.S. Department of Agriculture (USDA). The VSI was conducted on March 23, 1992. It included interviews with facility representatives and a walk-through inspection of the facility. PRC identified six SWMUs and no AOCs at the facility.

PRC completed EPA Form 2070-12 using information gathered during the PA/VSI. This form is included in Attachment A. The VSI is summarized and five inspection photographs are included in Attachment B. Field notes from the VSI are included in Attachment C.

2.0 FACILITY DESCRIPTION

This section describes the facility's location; past and present operations; waste generating processes and waste management practices; a history of documented releases; regulatory history; environmental setting; and receptors.

2.1 FACILITY LOCATION

The Procter & Gamble Ivorydale Manufacturing Complex is located on Spring Grove Avenue in Cincinnati, Ohio in Hamilton County (latitude 39°10'30"N, longitude 84°30'55"W), as shown in Figure 1. A small southern portion of the facility is across Spring Grove Avenue. The Procter & Gamble Company has three facilities in the area, all operating under different hazardous waste generator identification numbers. The facilities are the Procter & Gamble Ivorydale Technical Center (ITC), the Procter & Gamble Ivorydale Manufacturing Complex, and the Procter & Gamble Saint Bernard Plant (Saint Bernard). The Procter & Gamble Ivorydale Manufacturing Complex completely surrounds ITC (see Figure 2). The Saint Bernard facility lies southeast of the Procter & Gamble Manufacturing Complex, across Spring Grove Avenue. This report documents the results of the PA/VSI of the Procter & Gamble Ivorydale Manufacturing Complex (P&G) only.

P&G is bordered to the north by the Henkel Corporation, to the east by the Vulcan Oil Company, to the south by Nu-Maid Margarine and A&R Industries, and to the west by Enerfab Incorporated.

2.2 FACILITY OPERATIONS

The P&G facility occupies about 120 acres; about 75 percent of this area is indoors. The Procter & Gamble Company began manufacturing soap at the P&G location in 1885. Over the years, soap manufacturing operations have continued, along with the production of various oil-based foods. Additions and upgrades have continuously occurred at the facility over the years (P&G, 1992a). The facility contains numerous bulk storage tanks used for food product and soap storage.

Manufacturing and distributing bar soaps, synthetic detergents, and oil-based food products are the main industrial processes at the facility. As a part of the manufacturing process, fatty acids and vegetable oils are hydrolyzed. The hydrolyzation process occurs in a vertical countercurrent column in which animal fat and water are reacted at elevated pressures and temperatures. Under these conditions, the fat is split by the water, producing fatty acid and a

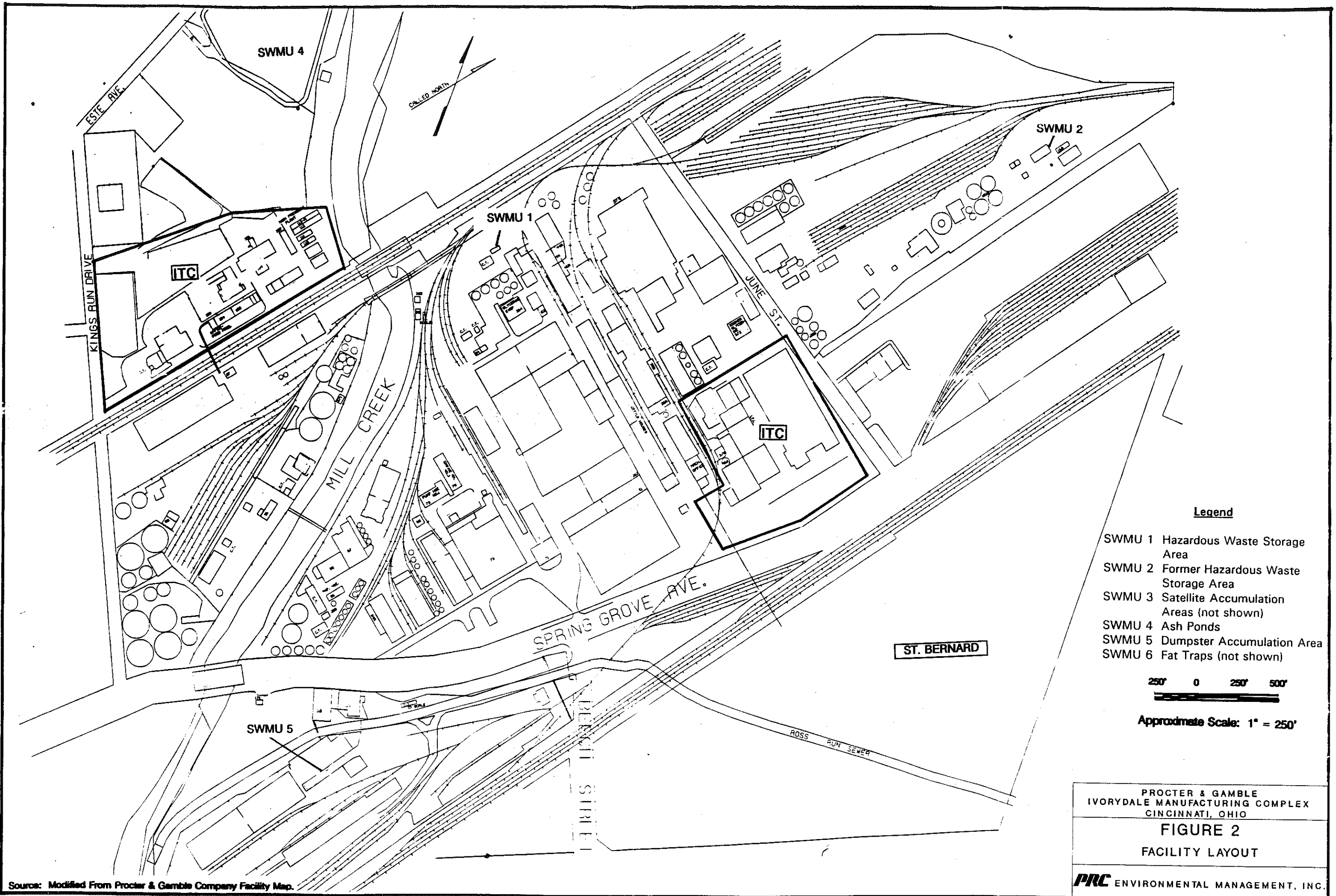


PROCTER & GAMBLE COMPANY
IVORYDALE TECHNICAL CENTER
CINCINNATI, OHIO

FIGURE 1
FACILITY LOCATION

Source: Adapted From USGS,
Cincinnati West and Cincinnati East Quadrangles, Photorevised, 1981.

PRC ENVIRONMENTAL MANAGEMENT, INC.



Source: Modified From Procter & Gamble Company Facility Map.

crude glycerine. Both the fatty acid and glycerine are further purified through distillation (P&G, 1992b).

Because P&G generates mainly nonhazardous waste, regulatory involvement over the years has been limited. According to P&G representatives, P&G has a large support staff involved in waste management, and recycling alternatives for wastes generated are continuously explored.

PRC identified six SWMUs and no AOCs at the facility (see Table 1). The SWMU locations are shown in Figure 2.

2.3 WASTE GENERATION AND MANAGEMENT

P&G generates waste cleaning and process solvents (F001 and D001), waste paint solvents (D001), waste laboratory chemicals (mainly P and U wastes), nonhazardous waste process tank cleaning sludges, nonhazardous wastewater, nonhazardous waste oils, nonhazardous flyash, and nonhazardous construction debris (see Table 2) (P&G, 1992a).

Waste cleaning and process solvents are generated throughout the main P&G buildings in research and development laboratories. These solvents are generated during parts cleaning activities. Acetone, isobutanol, toluene, methylene chloride (all F001), naphtha, and solvent-based perfumes (both D001) are routinely used. The waste solvents are accumulated in Satellite Accumulation Areas (SAA) (SWMU 3) in the laboratories. SWMU 3 is made up of stainless steel containers with capacities of 2.5 to 5 gallons. The waste solvents are transferred to the Hazardous Waste Storage Area (SWMU 1) for less than 90-day storage. P&G generates about four 55-gallon drums of waste solvents every 90 days. The solvents are removed from the facility for recycling by Safety-Kleen Corporation.

Waste solvents are also generated by seasonal painting throughout the facility. These include mineral spirits and lacquer thinner (both D001). The wastes are accumulated in 55-gallon drums (SWMU 3). When full, the drums are moved to SWMU 1 for less than 90-day storage. P&G generates about one 55-gallon drum of these solvents every 90 days. The solvents are removed from the facility for fuels blending by Chemical Waste Management, Inc.

Waste laboratory chemicals (mainly P and U wastes) are generated through testing and reagent expiration in the research and development laboratories. P&G periodically collects the waste chemicals from the laboratories for transfer to the Hazardous Waste Storage Area (SWMU 1) for less than 90-day storage. The chemicals are lab-packed about twice per year by

TABLE 1
SOLID WASTE MANAGEMENT UNITS

<u>SWMU Number</u>	<u>SWMU Name</u>	<u>RCRA Hazardous Waste Management Unit^a</u>	<u>Status</u>
1	Hazardous Waste Storage Area	Yes	Active, less than 90-day storage (closure from greater than 90-day status never applied for)
2	Former Hazardous Waste Storage Area	Yes	Inactive since late 1981; closed in 1983 (closure never approved by EPA or OEPA)
3	Satellite Accumulation Areas	No	Active
4	Ash Ponds	No	Active
5	Dumpster Accumulation Area	No	Active
6	Fat Traps	No	Active

Note:

^a A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit application.

TABLE 2
SOLID WASTES

<u>Waste/EPA Waste Code^a</u>	<u>Source</u>	<u>Solid Waste Management Unit</u>
Waste solvents: acetone, isobutanol, toluene, and methylene chloride (all F001) and naphtha and solvent-based perfumes (both D001)	Research and development laboratories	SWMUs 1 and 3
Waste paint solvents: mineral spirits and lacquer thinner (D001)	Seasonal painting	SWMUs 1 and 3
Waste laboratory chemicals (mainly P and U wastes)	Research and development laboratories	SWMU 1
Waste process tank cleaning sludges/NA	Hydrolyzation tanks	SWMU 3
Wastewater/NA	Hydrolysis process	SWMU 6
Waste oils/NA	Wastewater from hydrolyzation process, maintenance	SWMUs 3 and 6
Flyash/NA	Boilers	SWMU 4
Construction debris/NA	Facility construction	SWMU 5
Waste reacted sodium slag/D008 ^b	Batch Mixing Operation	SWMUs 2 and 3

Notes:

^a Not applicable (NA) designates nonhazardous waste.

^b This waste is no longer generated at the facility.

Rollins Environmental Services. P&G generates less than 2 gallons of the waste laboratory chemicals per year. . .

Nonhazardous fat- and oil-based sludges are generated when process tanks are cleaned. Sludge tends to settle in the tanks during the hydrolyzation of fatty acids and vegetable oils. The tanks are periodically emptied, and the sludges are placed in 55-gallon drums. The drums are accumulated in SAAs adjacent to the source. The waste process tank cleaning sludges are eventually removed from the facility by Heritage Environmental Services of Indianapolis, Indiana. These wastes are used as part of a supplemental fuel program, or combined with sand and sawdust and taken to the Elda Landfill in Cincinnati (P&G, 1992b).

Nonhazardous wastewater is generated by the hydrolysis process. Oil derivatives from vegetable or animal fats are the main contaminants in the wastewater. The wastewater is directed through Fat Traps (SWMU 6) at the facility to decant oils or fats before it exits to the Metropolitan Sewer District (MSD) wastewater treatment plant.

Nonhazardous waste oils are generated during oil-water separation and maintenance. P&G uses Fat Traps (SWMU 6) to collect process vegetable oils and animal fats from wastewater before it exits the facility. The wastes are occasionally pumped from the Fat Traps to railroad tanker cars and removed from the facility as nonhazardous waste. The wastes are sold for use in the drilling mud industry and as a supplement in the preparation of animal feed. Waste oils are also generated during vehicle maintenance and equipment. The waste oils are placed in 55-gallon drums and accumulated in the SAAs. The waste oils are removed from the facility for use as a fuel supplement by Heritage Environmental Services in Indianapolis, Indiana.

Nonhazardous flyash is generated at the facility by burning coal in boilers. The flyash is mixed with water and is conveyed directly from the boilers through a pipeline to the Ash Ponds (SWMU 4). As the flyash settles in the ponds, effluent overflows and is directed to the MSD wastewater treatment plant. The settled flyash is dredged from the ponds once per year and taken to the Elda Landfill in Cincinnati.

Construction debris, including waste metal, is generated by various equipment upgrades and construction at the facility. The wastes are transferred to the Dumpster Accumulation Area (SWMU 5) and, depending on the waste, either removed to the Elda Landfill or recycled.

Until late-1981, P&G generated about one 55-gallon drum of waste reacted sodium slag (D008) from a batch chemical mixing process. The waste was placed in an SSA (SWMU 3) and

eventually transferred to SWMU 2 for greater than 90-day storage. The waste was eventually taken to the CECOS/CER landfill in Clermont County, Ohio (OEPA, 1981).

2.4 HISTORY OF DOCUMENTED RELEASES

No releases from this facility have been documented.

2.5 REGULATORY HISTORY

In November 1980, P&G submitted a Part A permit application identifying the facility as a treatment, storage, or disposal facility with S01 storage of waste in drums (P&G, 1980). A Notification of Hazardous Waste Activity was not available in the files reviewed. The Part A permit application listed soap and other detergents, vegetable shortening, oils, prepared bake mixes, and toilet goods as products at the facility. Hazardous waste codes listed on the permit were D001, D002, and D003. The permit listed two waste storage areas. The first, the current Hazardous Waste Storage Area (SWMU 1), has a capacity of about 66 55-gallon drums; the second, the Former Hazardous Waste Storage Area, had a capacity of about 12 55-gallon drums. The Part A permit application also listed 42 air permits at the facility (P&G, 1980).

During August 1981, OEPA performed a RCRA interim status inspection at P&G and learned that both waste storage areas listed on the Part A permit application were being used. However, little hazardous waste was being generated, and P&G stated the generation amounts listed on the permit application were vastly overestimated (OEPA, 1981).

In September 1982, P&G informed OEPA that it wished to withdraw the Part A permit application and that the company would close a hazardous waste storage area (the Former Hazardous Waste Storage Area [SWMU 2]). Hazardous waste would be stored for less than 90 days in the remaining storage area (the Hazardous Waste Storage Area [SWMU 1]) (P&G, 1982). During September 1983, P&G notified OEPA that the storage area had been closed and that closure had been certified by a registered professional engineer (P&G, 1983). OEPA forwarded the information to EPA, and in September 1984, EPA notified P&G that the company's status had been changed to generator with less than 90-day storage (EPA, 1984). In April 1985, OEPA acknowledged the change in status (OEPA, 1985). It should be noted that SWMU 1 has never gone through proper closure and that SWMU 2 has never received final closure approval from EPA and OEPA.

OEPA performed compliance inspections at the facility during the early-1980s. Violations included lack of proper training for hazardous waste handlers and lack of

documentation for inspections of hazardous waste storage areas. The violations were addressed adequately by P&G (OEPA, 1981 through 1984).

In conjunction with ITC, P&G possesses a National Pollutant Discharge Elimination System (NPDES) permit for the discharge of storm water and excess noncontact cooling tower water (P&G, 1991). P&G is responsible for monitoring one outfall that discharges to the Mill Creek. The company is required to monitor discharge water for temperature, pH, and flow. Over the years, P&G has been free of NPDES violations.

P&G holds a permit to discharge wastewater to the MSD sewer system (MSD, 1992). No wastewater treatment occurs on-site except for oil collection in the Fat Traps (SWMU 6). The three Procter & Gamble facilities in the area are served by the MSD combined sewer system. During the late 1980s, as a result of periodic inspections, MSD became concerned with the efficiency of the Fat Traps (MSD, 1989). In conjunction with OEPA, MSD has requested that P&G increase the efficiency of the units. P&G is currently following through with the upgrades (OEPA, 1991).

P&G has about 45 air permits (P&G, 1992a). The permits are mainly for releases from the hydrolysis process. The facility does not have a history of air permit compliance problems, although local residents occasionally complain about odors in the area. To address this problem, P&G, in conjunction with the other Procter & Gamble facilities in the area, occasionally arranges review boards comprised of local residents. These review boards attempt to match odors with vapor discharges from the facility. Foul odors have rarely been traced to P&G. The area around the facility is highly industrialized, and most companies have air discharges.

No underground storage tanks were identified at the facility. No Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) activity has occurred at the facility.

2.6 ENVIRONMENTAL SETTING

This section describes the climate; flood plain and surface water; geology and soils; and ground water in the vicinity of the facility.

2.6.1 Climate

The climate in Cincinnati consists of cold winters and hot summers. The yearly average temperature is 54 degrees Fahrenheit (°F). The lowest average monthly temperature is 21.7°F in

January. The highest average monthly temperature is 86.8°F in July. Precipitation for southwest Ohio is well distributed throughout the year. Average yearly rainfall for Hamilton County is 40.07 inches. Rainfall peaks in March at 4.18 inches and is at its least in October at 2.38 inches. The 1-year, 24-hour maximum rainfall is 2.6 inches, and the average yearly net precipitation is 6.0 inches. The prevailing wind is from the south-southwest, and the highest average wind speed is 11 miles per hour in the winter (USDA, 1982).

2.6.2 Flood Plain and Surface Water

The Mill Creek flows through the P&G facility and eventually enters the Ohio River about 6.5 miles south of the facility. The Mill Creek is used mainly for storm water drainage from various industrial facilities along its route. The Ohio River is used as a drinking water source for the City of Cincinnati, as a transportation route, and for recreational purposes. A small portion of the facility along the Mill Creek lies in a 100-year flood plain (National Flood Insurance Program, 1974).

In 1988, the City of Cincinnati completed a concrete channelization project on portions of the Mill Creek to prevent erosion. The portion that runs through the P&G facility has been channelized.

2.6.3 Geology and Soils

Hamilton County lies almost on the crest of the Cincinnati Arch, a large anticline running from Tennessee to Canada. The bedrock in the area is Ordovician-age shale of the Kope formation, consisting of a 67- to 100-foot sequence of interbedded shales and limestones. Depth to bedrock in the area is about 150 feet below ground surface. During the Tertiary period (about 36 million years ago), the Hamilton County area was deeply eroded by a large drainage system that emptied into the ancient Teays River system. Pleistocene glaciation (about 2 million years ago) radically altered the drainage system, changing flow direction and filling valleys with glacial deposits of till, sand, clay, silt, and gravel (USDA, 1982).

Glacial materials in the Cincinnati area were deposited as a result of Illinoian and Wisconsinan glaciation periods. The glacial deposits in the area of the P&G facility are quite unconsolidated and consist of the following materials in descending order (ODNR, 1992):

- | | |
|--------------------|------------------------|
| • 0 to 8 feet: | Soil and fill material |
| • 6 to 12 feet: | Muddy gravel |
| • 12 to 65 feet: | Blue clay |
| • 65 to 115 feet: | Medium to coarse sand |
| • 115 to 150 feet: | Sand and gravel |

Soils near the facility belong to the Urban Land-Martinsville-Fox association. Typically, the Martinsville-Fox soils are well drained and medium textured. These soils are usually located on stream terraces and outwash plains. Because of the amount of industrial activity in the area, most original soils have been disturbed.

2.6.4 Ground Water

Local ground-water information is not available. Depth to ground water in the area is about 35 feet below ground surface. The P&G facility lies over glacial deposits capable of yielding 250 to 500 gallons of water per minute (ODNR, 1992). Bedrock in the area does not store or transmit large quantities of water. Ground-water flow is generally southwest towards the Ohio River; recharge is from ground-water flow from the north and surface infiltration (ODNR, 1988). The nearest drinking water well is about 4 miles northwest of the facility in Lockland.

2.7 RECEPTORS

The P&G facility is located in a highly industrialized area of western Cincinnati and is completely surrounded by other industrial facilities. P&G is bordered to the north by the Henkel Corporation, to the east by the Vulcan Oil Company, to the south by Nu-Maid Margarine and A&R Industries, and to the west by Enerfab Incorporated.

The nearest residential area is Winton Place, about 2,000 feet east of P&G. About 300 private residences are within 1 mile of the facility. The nearest school is 1.5 miles southeast. As mentioned in Section 2.5, local residents have occasionally complained about unpleasant odors from the P&G facilities; however, no hazardous air releases have been identified from P&G. The facility is monitored 24 hours per day by security personnel and is surrounded by a 6-foot-high steel chain-link fence.

As mentioned in Section 2.6.2, the Mill Creek flows through the facility and enters the Ohio River about 6.5 miles south of the facility. The Mill Creek is used mainly for storm water drainage.

Area ground water is not generally used as a local drinking water source. Most drinking water in the area is supplied by the City of Cincinnati (ODNR, 1988). The City of Cincinnati draws water from an intake on the Ohio River about 9 miles above the confluence of the Ohio River and Mill Creek. The nearest drinking water well is located about 4 miles northwest and

upgradient of the facility in Lockland. There are no drinking water wells downgradient from the P&G facility. The P&G facility receives all water from the City of Cincinnati.

The Mill Creek is a sensitive environment mainly because of aquatic life. No wetlands exist within 2 miles of the facility.

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the six SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and PRC's observations. Figure 2 shows the SWMU locations.

SWMU 1

Hazardous Waste Storage Area

Unit Description:

The Hazardous Waste Storage Area is located in the west-central portion of the facility. It is composed of an aluminum building over a 20-by-20-foot concrete pad. The concrete pad is sealed and surrounded by a 6-inch concrete berm. The walls of the building are weak in areas to allow release in case of an explosion. The area can hold about 66 55-gallon drums (see Photograph No. 1). The storage area is kept locked and can be opened only by assigned personnel and is monitored regularly.

Date of Startup:

The unit was constructed in 1980.

Date of Closure:

The unit is active. It was listed on the original Part A permit application for the facility and has not gone through closure. It has been used for less than 90-day storage since 1983.

Wastes Managed:

The unit is used to store the following hazardous waste solvents: acetone, isobutanol, toluene, methylene chloride (all F001) and naphtha, solvent-based perfumes, mineral spirits, and lacquer thinner (all D001). The unit also occasionally houses waste laboratory chemicals (mainly P and U wastes). Depending on the wastes, the materials are either recycled, reclaimed, or landfilled (see Section 2.3).

Release Controls:

The unit is enclosed in a building and has a sealed concrete base. The concrete base is surrounded by a 6-inch concrete berm. The unit is kept locked and can be opened only by assigned personnel and is monitored regularly.

History of Documented Releases:	No releases have been documented from this unit.
Observations:	During the VSI, the unit was in sound condition, displaying no cracks or stains in the concrete base. About 10 55-gallon drums of hazardous waste were present in the unit.
SWMU 2	Former Hazardous Waste Storage Area
Unit Description:	The Former Hazardous Waste Storage Area is located at the northeast end of the facility. The area measures about 8 feet by 8 feet and is enclosed on three sides (see Photograph No. 2). It has a concrete base with a 2-inch concrete berm at the entranceway. The area had a capacity of about 12 55-gallon drums. It was used for the storage of waste reacted sodium slag generated by a chemical manufacturing process. An OEPA inspection performed at P&G in 1981 indicated that about one 55-gallon drum of waste reacted sodium slag was generated every 6 months. In 1981, the process was discontinued by P&G.
Date of Startup:	The unit was constructed in 1980.
Date of Closure:	The unit has been inactive since 1981. The unit was closed in 1983. P&G closed the area in 1983, however no documentation is available indicating that the closure was approved by EPA or OEPA. A status change was eventually granted to the facility by both agencies.
Wastes Managed:	The unit was used for the storage of waste reacted sodium slag (D008). The waste was eventually taken to the CECOS/CER landfill in Clermont County, Ohio.
Release Controls:	The unit was partially enclosed and was on a concrete base. The concrete base contained a 2-inch concrete berm at the entranceway.
History of Documented Releases:	No releases have been documented from this unit.

Observations:	The unit is now used as a storage area for maintenance equipment. No stains or severe cracks were noted in the concrete base.
SWMU 3	Satellite Accumulation Areas (SAA)
Unit Description:	<p>SAAs are used throughout the P&G facility in research and development laboratories and maintenance areas. Waste solvents are accumulated in reusable stainless steel containers, with capacities of 2.5 to 5 gallons. The containers are removed periodically to the Hazardous Waste Storage Area (SWMU 1), where the solvents are transferred to 55-gallon drums.</p> <p>SAAs are also used for storing nonhazardous waste process tank cleaning sludge and waste oils. The wastes are accumulated in 55-gallon drums on concrete. P&G has no specified waste oil storage area. Drums are placed in a work area when needed.</p> <p>SAAs were also used for accumulating a 55-gallon drum of waste reacted sodium slag until late 1981, prior to storage at SWMU 2.</p>
Date of Startup:	SAAs have been used at the facility since the mid-1970s.
Date of Closure:	The units are active.
Wastes Managed:	SAAs are used for storage of the following hazardous waste solvents: acetone, isobutanol, toluene, and methylene chloride (all F001) and naphtha, solvent-based perfumes, mineral spirits, and lacquer thinner (all D001). SAAs are also used for accumulation of nonhazardous waste process tank cleaning sludges and waste oils and, in the past, waste reacted sodium slag (D008) accumulation.
Release Controls:	The SAAs used for hazardous waste are kept indoors, composed of stainless steel, and are emptied regularly. Nonhazardous SAAs are used for short-term accumulation, and are kept on concrete.
History of Documented Releases:	No releases have been documented from this unit.

Observations:	PRC observed a number of SAAs. The units were in sound condition, and no spills or stain residue were noted in the areas where the units were located.
SWMU 4	
Ash Ponds	
Unit Description:	<p>The Ash Ponds are located at the western end of the facility. The area is composed of two unlined settling ponds that cover about 6 acres (see Photograph No. 3). The ponds are used for settling nonhazardous flyash generated from P&G's boiler system.</p> <p>At the boilers, water is added to the flyash creating a slurry. The slurry is pumped from the boilers to one of the holding ponds until it nears its capacity. P&G representatives did not know the total capacity of the ponds. The flyash is then pumped to the second pond and flyash in the first is allowed to settle. Water on top of the settled flyash then exits the pond to the MSD. The same process is then used for the second pond. The ponds are dredged about once per year, and the flyash is removed to the Elda Landfill in Cincinnati.</p>
Date of Startup:	The ponds were first used during the 1940s.
Date of Closure:	The units are active.
Wastes Managed:	The ponds are used for settling nonhazardous flyash from P&G's boiler system.
Release Controls:	The ponds are surrounded by earthen berms. P&G did not know the total capacity of the ponds.
History of Documented Releases:	No releases have been documented from this unit.
Observations:	During the VSI, flyash appeared to be settling in the ponds. The area around the ponds was free from scattered flyash, and it appeared that the ponds are well maintained.

SWMU 5**Dumpster Accumulation Area****Unit Description:**

The Dumpster Accumulation Area is located at the southern end of the facility just across Spring Grove Avenue. The area is composed of four steel dumpsters set against a concrete loading dock (see Photograph Nos. 4 and 5). The dumpsters are stationed over concrete containing drains that exit to the Mill Creek. The dumpsters are used for the collection of construction debris, including waste metal.

Date of Startup:

The area had been used as a product loading dock until the late 1970s. P&G converted it into the Dumpster Accumulation Area in the mid-1980s.

Date of Closure:

The unit is active.

Wastes Managed:

The unit is used for the collection of construction debris, including waste metal.

Release Controls:

The area has no release controls.

History of Documented Releases:

No releases have been documented from this unit.

Observations:

During the VSI, all of the dumpsters in the unit were empty. A small amount of scattered trash was laying around one of the dumpsters.

SWMU 6**Fat Traps****Unit Description:**

Fat Traps are located in various wastewater discharge areas throughout the facility. Fat Traps are used to recover waste oils, mainly vegetable oils and animal fats, from wastewater before it is discharged to the MSD system. The units are constructed of steel and have various dimensions. Along the route to the discharge area, wastewater enters a Fat Trap and is temporarily held. The oils and fats float on the water surface and are contained by a weir. The separated wastewater flows under the weir and on to an MSD

outlet. Separated oils and fats are pumped to rail cars and eventually removed from the facility and sold for use as a component of drilling mud and as a supplement to animal feeds.

The Fat Traps were first installed in the 1920s. Since that time, additional units have been added and most have been refurbished. During the late 1980s, as a result of periodic inspections, MSD became concerned with the efficiency of the units. In conjunction with OEPA, MSD has requested that P&G increase the efficiency of the units. P&G is currently following through with the upgrades.

Date of Startup:

Fat Traps have been used at P&G since the 1920s.

Date of Closure:

The units are active.

Wastes Managed:

The units are used to collect nonhazardous waste oils, mainly vegetable oils and animal fats, from wastewater discharged from various processes.

Release Controls:

The units are constructed of steel and use a weir to contain oils and fats.

History of
Documented Releases:

Although specific releases have not been documented, during the late 1980s MSD requested that P&G increase the efficiency of the units.

Observations:

During the VSI, the units could not be assessed because they are underground.

4.0 AREAS OF CONCERN

PRC identified no AOCs during the PA/VSI.

RELEASED

DATE

RIN #

INITIALS

4/26/00
atv

ENFORCEMENT
CONFIDENTIAL

5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified six SWMUs and no AOCs at the P&G facility. Background information on the facility's location; operations; waste generating processes and waste management practices; history of documented releases; regulatory history; environmental setting; and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented releases, and observed condition, is presented in Section 3.0. Following are PRC's conclusions and recommendations for each SWMU. Table 3, at the end of this section, summarizes the SWMUs at the facility and the recommended further actions.

SWMU 1

Hazardous Waste Storage Area

Conclusions:

The Hazardous Waste Storage Facility is located at the west central portion of the facility. The unit is monitored regularly and provides adequate containment. During the VSI, PRC noted no stains or deterioration of the unit. The future potential for releases to ground water, surface water, air, and on-site soils is low. However, in the past, this unit was used for greater than 90-day storage and has never been formally closed.

Recommendations:

PRC recommends the facility submit a closure plan to EPA and OEPA.

SWMU 2

Former Hazardous Waste Storage Area

Conclusions:

The Former Hazardous Waste Storage Area is located at the northeast end of the facility. The unit was closed by P&G in 1983 and has not been used for waste storage since. The unit has a concrete base and the area surrounding it is covered with concrete. Although P&G's regulatory status was changed as a result of the closure, neither EPA or OEPA ever actually approved the closure. The potential for release to ground water, surface water, air, and on-site soils is low.

Recommendations:

Because a status change was granted at the facility, EPA should determine if closure of the unit has been accomplished or is necessary.

RELEASED
DATE 9/26/00
RIN #
INITIALS mv

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SWMU 3

Satellite Accumulation Areas

Conclusions:

SAAs are used throughout the P&G facility in research and development laboratories and maintenance areas. The units are used for storage of hazardous wastes, nonhazardous waste process tank cleaning sludge, and waste oils. SAAs are monitored regularly and are used for short-term storage. PRC noted no releases during the VSI. The potential for release to ground water, surface water, air, and on-site soils is low.

Recommendations:

PRC recommends no further action for this SWMU.

SWMU 4

Ash Ponds

Conclusions:

The Ash Ponds are located at the western end of the facility. The two ponds cover about 6 acres and are used for settling nonhazardous flyash generated from P&G's boiler system. The water exiting the ponds flows to the MSD system, and sludge is dredged from the ponds about once per year and removed to an off-site landfill. No releases from the ponds have been documented. Because the flyash is nonhazardous, the potential for releases of hazardous constituents to ground water, surface water, air, and on-site soils is low.

Recommendations:

PRC recommends no further action for this SWMU.

SWMU 5

Dumpster Accumulation Area

Conclusions:

The Dumpster Accumulation Area is located at the southern end of the facility just across Spring Grove Avenue. The dumpsters are used for the accumulation of nonhazardous materials, including construction debris and metal. The dumpsters are stationed over concrete containing drains that empty to the Mill Creek. Because the materials accumulated in this area are nonhazardous, and because of P&G's sound waste management practices, this SWMU presents a low potential for hazardous releases to ground water, surface water, air, and on-site soils.

Recommendations:

PRC recommends no further action for this SWMU.

RELEASED

DATE

RIN #

INITIALS

9/26/00
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CONFIDENTIAL

SWMU 6

Fat Traps

Conclusions:

Fat Traps are located along various wastewater discharge lines throughout the facility. The units are used to collect waste oils, mainly vegetable oils and animal fats, from wastewater before it exits the facility to the MSD sewer system. At the request of MSD and OEPA, P&G is currently upgrading the Fat Traps to increase containment efficiency. The potential for release to ground water, surface water, air, and on-site soils is low. However, inefficiency of the units has been noted, and the potential for continued releases still exists.

Recommendations:

PRC recommends no further action by EPA for this SWMU. The situation is being monitored by MSD and OEPA, and unit upgrades are being implemented.

RELEASED
 DATE 9/26/00
 RIN #
 INITIALS

TABLE 3
 SWMU SUMMARY

ENFORCEMENT
 CONFIDENTIAL

<u>SWMU</u>	<u>Dates of Operation</u>	<u>Evidence of Release</u>	<u>Recommended Further Action</u>
1. Hazardous Waste Storage Area	1980 to present	None; changed storage period from greater than 90 days to less than 90 days without formal closure	Facility should submit a closure plan to EPA and OEPA.
2. Former Hazardous Waste Storage	1980 to 1983	None	EPA should determine if closure of the unit has been accomplished or is necessary.
3. Satellite Accumulation Areas (SAA)	Mid-1970s to present	None	No further action
4. Ash Ponds	1940s to present	None	No further action
5. Dumpster Accumulation Area	Mid-1980s to present	None	No further action
6. Fat Traps	1920s to present	MSD has questioned the efficiency of the units.	No further action by EPA. The situation is being monitored by MSD and OEPA, and unit upgrades are being implemented.

REFERENCES

- Metropolitan Sewer District, City of Cincinnati, (MSD), 1989. Wastewater Management Inspection at Procter & Gamble (P&G) Citing Poor Performance of Fat Traps, September 28.
- MSD, 1992. Wastewater Discharge Permit for P&G, February 7.
- National Flood Insurance Program, 1974. Flood Plain Information for Henkel Area.
- Ohio Department of Natural Resources (ODNR), 1988. Sole Source Aquifer Project Review Area, Hamilton County, February.
- ODNR, 1992. Well Log Packet for Procter & Gamble Ivorydale Manufacturing Complex (P&G).
- Ohio Environmental Protection Agency (OEPA), 1981. RCRA Interim Status Inspection of P&G, August.
- OEPA, 1982. RCRA Interim Status Inspection of P&G, April 6.
- OEPA, 1983. RCRA Interim Status Inspection of P&G, April 18.
- OEPA, 1984. RCRA Interim Status Inspection of P&G, September 18.
- OEPA, 1985. Letter to P&G Indicating Change in Status, April 1.
- OEPA, 1991. Letter to P&G Approving of Fat Trap Upgrades, September 23.
- P&G, 1980. Part A Permit Application for P&G, November 14.
- P&G, 1982. Letter to OEPA Indicating that a Hazardous Waste Storage Facility Would be Closed, September 8.
- P&G, 1983. Letter to OEPA Indicating that Closure had been Completed, September 7.
- P&G, 1991. National Pollutant Discharge Elimination System Permit for P&G.
- P&G, 1992a. Information Packet Given to PRC Environmental Management, Inc. (PRC), During the VSI, March 23.
- P&G, 1992b. Letter from Peter Dawson, P&G Engineer, to Pete Zelinskas, PRC, Clarifying Processes at the Facility, July 30.
- U.S. Department of Agriculture (USDA), 1982. Soil Survey of Hamilton County.
- U.S. Environmental Protection Agency (EPA), 1984. Letter to P&G Indicating Change in Status, September 27.
- U.S. Geological Survey (USGS), 1981. Cincinnati West and Cincinnati East 7.5 Minute Quadrangles.

ATTACHMENT A
EPA PRELIMINARY ASSESSMENT FORM 2070-12



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE OH	02 SITE NUMBER OHD 092 818 368
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II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site) Procter & Gamble Ivorydale Manufacturing Complex		02 STREET, ROUTE NO. OR SPECIFIC LOCATION IDENTIFIER 5201 Spring Grove Avenue			
03 CITY Cincinnati	04 STATE OH	05 ZIP CODE 45217	06 COUNTY Hamilton	07 COUNTY CODE	08 CONG DIST
09 COORDINATES: LATITUDE 39° 10' 30".N		LONGITUDE 84° 30' 55".W			
10 DIRECTIONS TO SITE (Starting from nearest public road) Take I-75 North from downtown Cincinnati. Take the Mitchell Avenue exit and go left on Mitchell Avenue. Go right on Spring Grove Avenue. Travel about one mile. Facility will be on the left.					

III. RESPONSIBLE PARTIES

01 OWNER (if known) Procter & Gamble Company		02 STREET (Business, mailing, residential) One Procter & Gamble Plaza			
03 CITY Cincinnati	04 STATE OH	05 ZIP CODE 45201	06 TELEPHONE NUMBER (513) 627-5633		
07 OPERATOR (if known and different from owner)		08 STREET (Business, mailing, residential)			
09 CITY	10 STATE	11 ZIP CODE	12 TELEPHONE NUMBER		
13 TYPE OF OWNERSHIP (Check one) <input checked="" type="checkbox"/> A. PRIVATE <input type="checkbox"/> B. FEDERAL: _____ (Agency Name) <input type="checkbox"/> C. STATE <input type="checkbox"/> D. COUNTY <input type="checkbox"/> E. MUNICIPAL <input type="checkbox"/> F. OTHER _____ (Specify) <input type="checkbox"/> G. UNKNOWN					
14. OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply) <input type="checkbox"/> A. RCRA 3010 DATE RECEIVED: ____/____/____ MONTH DAY YEAR <input type="checkbox"/> B. UNCONTROLLED WASTE SITE (CERCLA 103 c) DATE RECEIVED: ____/____/____ MONTH DAY YEAR <input type="checkbox"/> C. NONE					

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION <input checked="" type="checkbox"/> YES DATE 03/23/92 <input type="checkbox"/> NO		BY (Check all that apply) <input type="checkbox"/> A. EPA <input checked="" type="checkbox"/> B. EPA CONTRACTOR <input type="checkbox"/> C. STATE <input type="checkbox"/> D. OTHER CONTRACTOR <input type="checkbox"/> E. LOCAL HEALTH OFFICIAL <input type="checkbox"/> F. OTHER: _____ (Specify) CONTRACTOR NAME(S): PRC Environmental Management, Inc.			
02 SITE STATUS (Check one) <input checked="" type="checkbox"/> A. ACTIVE <input type="checkbox"/> B. INACTIVE <input type="checkbox"/> C. UNKNOWN		03 YEARS OF OPERATION 1885 present BEGINNING YEAR ENDING YEAR <input type="checkbox"/> UNKNOWN			
04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED The facility generates waste solvents (F001 and D001), waste laboratory chemicals (mainly P and U wastes), waste tank cleaning sludges, waste oils, flyash, wastewater, construction debris, and metal debris.					
05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION Low potential hazard of release from SWMUs.					

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents.) <input type="checkbox"/> A. HIGH (Inspection required promptly) <input type="checkbox"/> B. MEDIUM (Inspection required) <input type="checkbox"/> C. LOW (Inspect on time-available basis) <input type="checkbox"/> D. NONE (No further action needed; complete current disposition form)			
--	--	--	--

VI. INFORMATION AVAILABLE FROM

01 CONTACT Kevin Pierard	02 OF (Agency/Organization) U.S. EPA		03 TELEPHONE NUMBER (312) 886-4448	
04 PERSON RESPONSIBLE FOR ASSESSMENT Pete Zelinskas	05 AGENCY	06 ORGANIZATION PRC	07 TELEPHONE NUMBER (513) 241-0149	08 DATE 09 / 10 / 92 MONTH DAY YEAR

ATTACHMENT B
VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

VISUAL SITE INSPECTION SUMMARY

**Procter & Gamble
Ivorydale Manufacturing Complex
Cincinnati, Ohio
OHD 092 818 368**

Date: March 23, 1992
Primary Facility Representative: Mr. Peter Dawson, Environmental Engineer
Representative Telephone No.: (513) 627-5633
Additional Facility Representatives: Ms. Michelle Smith, Environmental Engineer

Inspection Team: Pete Zelinskas, PRC Environmental Management, Inc.
Tom Raptis, PRC Environmental Management, Inc.

Photographer: Tom Raptis

Weather Conditions: Sunny, cool, with temperatures between 40° and 50°

Summary of Activities: Separate VSIs were performed at the Procter & Gamble Ivorydale Technical Center (ITC) and at the Procter & Gamble Ivorydale Manufacturing Complex (P&G). PRC arrived at ITC at 11:30 a.m. and met with representatives of ITC and P&G. Plans for the inspections and operations at the two facilities were discussed over lunch. At 2:45 p.m., PRC met individually with P&G representatives and discussed waste generation, storage, and disposal methods used at P&G.

The site walk-through began at 3:15 p.m. PRC was given an overview of the hydrolyzation process, and waste storage areas, including various satellite accumulation areas. PRC returned to ITC at about 4:50 p.m. and left the facility.



Photograph No. 1
 Orientation: South
 Description: The interior of the Hazardous Waste Storage Area

Location: SWMU 1
 Date: 3/23/92



Photograph No. 2
 Orientation: South
 Description: The Former Hazardous Waste Storage Area

Location: SWMU 2
 Date: 3/23/92



Photograph No. 3
 Orientation: North
 Description: The Ash Ponds

Location: SWMU 4
 Date: 3/23/92



Photograph No. 4
 Orientation: Northeast
 Description: The Dumpster Accumulation Area

Location: SWMU 5
 Date: 3/23/92



Photograph No. 5
Orientation: Northeast
Description: The Dumpster Accumulation Area

Location: SWMU 5
Date: 3/23/92

ATTACHMENT C
VISUAL SITE INSPECTION FIELD NOTES

8

5-23-72

VSIs at Doctor and
Cunha Facilities

1. 5201 Spring Grove Ave.

Contact: Peter Dawson

627-5633

2. 5299 Spring Grove Ave.

627-5161

Contact: Mike Lewis

Weather: Sunny 75°

CH56, 043H

1130 5299 Spring Grove Ave

1230 Mike Lewis

Larry Sommer

Everyday Technical Center

1300 Delisted, listed

waste OMAB

SWM 1 Solvent Storage

area, Room Sound

Waste Storage.

John. Thomas 5-23-72

9

Grounding Note
Photos 1 & 2.

SWM 2 2 1/2 gallon
containers. Used solvent.

At Analytical Laboratories

Other labs do not use

these. Some use old coats

soaps + towels sent

to the office

City water

Southwest water

11. Areas showing toxicity

labs. Clotheswashers

and dishwashers. Most

have small collection

areas for solvents.

Only analytical labs.

At 6 Recycles everything.

Send towels + soap

John. Thomas 5-23-72

to freestone for distribution
water to MSD - sanitary
sewer.

Sumo 3 solvent storage
building. Ramp leading
down to storage
concrete. Air
was a solvent making
area. It was diked
from the street. Covered.
31980 changed over to
haz. waste storage area.
Rm. 3, 4, 5 Good shop
no problems Sept. 1980 made
waste storage area.
Some complaints from neighbors
2 yrs ago product storage
area. Everything exceptionally
diked.

Lab. Photo 8-23-82

1445 5299 Spring Grove
Michelle Smith
Mike Wilcox

Toxic. short. oil

Soups. But

Fatty acids. veg. oil &
hydrolysis

Glycerines from process
120 acres.

* North area batch making
epo. alcohols.

Industrial chemicals

Terminal & liquid base

Sumo 1 Satellite accu.

area. 5 gallon containers

Sumo 2 collection area

No hydro information
available have appeared

about 75 or 80 ac

permits 40-45 & 6.

is making at 5 getting
rid of hydrolysis of
fatty acid. Boet fat

Smell. Have lowered odor
level substantially

Drom Storage Area #2

Has waste. Photo 6

Curbed, enclosed, covered with
a sealant. Blow out wall
metal roof.

* Dumpster accumulation
area - waste collection
area. Same? Photo 7, 8

Same 2 North waste

storage area - Shop

Now - 8 x 8 bermed

* Industrial chemicals

were manufactured here

Basic Detergent 1971 June
ended. No Plans

Sodium Slag - reactive
stored there.

Landfill - construction
debris, fly ash material

late 50's - early 60's.

Active landfill used by
the City - 1940s. Part of
main - effluent canal system

Check landfill for
connection. Photo 10

* Fly ash ponds. Ammonia

Pumps one pond until
filled, switch to other

pond. At least once per

year, sludge is dragged

weeds or digger

to Elba landfill.

Photos 11 & 12 late 40's

Could not give number.

John R. Flanagan 5-23-92



THE PROCTER & GAMBLE COMPANY

IVORYDALE PLANT
5201 SPRING GROVE AVENUE
CINCINNATI, OHIO 45217
April 14, 1986

David A. Stringham
Chief, Solid Waste Branch
United States Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, Illinois 60604

Re: The Procter & Gamble Company - Ivorydale Plant
U.S. EPA ID No. OHD092818368
Hazardous Waste Permit Application -
Your Letter Dated 1/30/86

RECEIVED

APR 16 1986

SOLID WASTE BRANCH
U.S. EPA, REGION V

SOLID WASTE BRANCH
U.S. EPA, REGION V

APR 17 1986

RECEIVED

Dear Sir:

In early February 1986, the Ivorydale plant of The Procter & Gamble Company received a letter from you dated 1/30/86. This letter requested the plant to complete a Certification Regarding Potential Releases from Solid Waste Management Units (Certification) in connection with Region V's efforts to implement the corrective action provisions of the Hazardous and Solid Waste Amendments of 1984 (the 1984 Amendments). A copy of the 1/30/86 letter and Certification form is attached as Exhibit 1. The Ivorydale plant completed and returned the Certification to Region V on 3/13/86.

Upon further consideration of the Agency's 1/30/86 letter and the 1984 Amendments, Ivorydale has concluded that the corrective action provisions do not apply to it and, therefore, that it should not have submitted the Certification. The purpose of this letter is to explain why the provisions are inapplicable and to request the return of the completed Certification.

Background - The U.S. EPA interpreted the corrective action requirements of the 1984 Amendments and adopted a final regulation implementing the requirements in 50 F.R. 28701, 7/15/85 (the codification rule). The codification rule has been challenged by several parties in lawsuits currently pending in the U.S. Court of Appeals for the District of Columbia Circuit, United Technologies Corporation, Pratt & Whitney Group, et al. v. U.S. EPA, 85-1654 and Consolidated Cases. We understand that a variety of issues have been raised in these lawsuits, including whether the EPA violated the Administrative Procedure

-2-

David A. Stringham

April 14, 1986

Inapplicability of Corrective Action to Ivorydale - After RCRA's adoption, Ivorydale submitted Part A of the RCRA permit application to enable it to store hazardous wastes for more than 90 days. Ivorydale soon realized that it could manage its hazardous wastes without a storage permit, and it closed the storage facility. Ivorydale first notified the State of Ohio that it had closed the storage facility by letter dated 9/8/82, a copy of which is attached as Exhibit 2. Region V acknowledged closure of the storage facility and the withdrawal of the Part A by a letter to Ivorydale dated 9/27/84, a copy of which is attached as Exhibit 3.

Your 1/30/86 letter to us attached a copy of Section 3004(u) of the 1984 Amendments. Section 3004(u) states that corrective action should be required for releases of hazardous waste or constituents from any solid waste management unit at a storage facility "seeking a permit under this subtitle." This section does not apply to Ivorydale because the plant is seeking neither a post-closure permit nor an operating permit under RCRA Subtitle C. Ivorydale does not need a post-closure permit because it is not a disposal facility. Ivorydale is not seeking an operating permit because it discontinued the storage of waste over three years ago, closed its facility and withdrew its Part A application.

The preamble to the 7/15/85 regulations supports this interpretation. The EPA states at 50 F.R. 28712 that "Section 3004(u) does not appear to contemplate that its terms apply to solid waste management units located at facilities that are not required by regulations to obtain a Subtitle (C) permit." The Draft Guidance on Corrective Action for Continuing Releases, dated 1/30/85, issued by Jack W. McGraw to the Regions also supports this interpretation. That document at page 3, states: "The provision (3004u) also does not apply to facilities which have closed or will close under interim status, and which are not subject to post-closure permits." A copy of the relevant part of the Guidance document is attached as Exhibit 4.

Although your 1/30/86 letter to us only attached Section 3004(u), we are aware that Section 3008(h) of the 1984 amendments also addresses corrective action. This section is also inapplicable to Ivorydale because it applies to releases of hazardous waste from "a facility authorized to operate under Section 3005(e)" (i.e., a unit at a facility with interim status). We do not consider Ivorydale to be authorized to operate a storage facility under interim status because of the withdrawal of our Part A application. Region V acknowledged this in its 9/27/84 letter to us (Exhibit 3) where it states that Ivorydale must resubmit Part A in order to resume the storage of hazardous wastes for

-3-

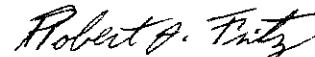
David A. Stringham

April 14, 1986

There is another reason the Certification should be returned. We have reconsidered the answers previously given. Although interpretation of some of the Certification's questions is very difficult because of uncertainty about the definitions of key terms, we believe some of the answers previously given may not be accurate. Therefore, reexamination of the answers is necessary to insure accuracy and completeness.

I look forward to your reply and the return of the Certification.

Sincerely,



Robert J. Fritz
Environmental Control Manager

RJF:crw

cc: RCRA Activities
Region V
P.O. Box A3587
Attention: ATKJG
Chicago, Illinois 60690

NR

CERTIFICATION REGARDING POTENTIAL RELEASES FROM
SOLID WASTE MANAGEMENT UNITS

FACILITY NAME: The Procter & Gamble Company
EPA I.D. NUMBER: OHIO 092818368
LOCATION CITY: CINCINNATI
STATE: OHIO

1. Are there any of the following solid waste management units (existing or closed) at your facility? NOTE - DO NOT INCLUDE HAZARDOUS WASTE UNITS CURRENTLY SHOWN IN YOUR PART A APPLICATION

	YES	NO
• Landfill	_____	<u>X</u>
• Surface Impoundment	_____	<u>X</u>
• Land Farm	_____	<u>X</u>
• Waste Pile	_____	<u>X</u>
• Incinerator	_____	<u>X</u>
• Storage Tank (Above Ground)	_____	<u>X</u>
• Storage Tank (Underground)	_____	<u>X</u>
• Container Storage Area	_____	<u>X</u>
• Injection Wells	_____	<u>X</u>
• Wastewater Treatment Units	_____	<u>X</u>
• Transfer Stations	_____	<u>X</u>
• Waste Recycling Operations	_____	<u>X</u>
• Waste Treatment, Detoxification	_____	<u>X</u>
• Other _____	_____	<u>X</u>

2. If there are "Yes" answers to any of the items in Number 1 above, please provide a description of the wastes that were stored, treated or disposed of in each unit. In particular, please focus on whether or not the wastes would be considered as hazardous wastes or hazardous constituents under RCRA. Also include any available data on quantities or volume of wastes disposed of and the dates of disposal. Please also provide a description of each unit and include capacity, dimensions and location at facility. Provide a site plan if available.

NONE

3. For the units noted in Number 1 above and also those hazardous waste units in your Part A application, please describe for each unit any data available on any prior or current releases of hazardous wastes or constituents to the environment that may have occurred in the past or may still be occurring.

Please provide the following information

- a. Date of release
- b. Type of waste released
- c. Quantity or volume of waste released
- d. Describe nature of release (i.e., spill, overflow, ruptured pipe or tank, etc.)

NONE

4. In regard to the prior or continuing releases described in Number 3 above, please provide (for each unit) any analytical data that may be available which would describe the nature and extent of environmental contamination that exists as a result of such releases. Please focus on concentrations of hazardous wastes or constituents present in contaminated soil or groundwater.

NOT APPLICABLE

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the submittal is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. (42 U.S.C. 6902 et seq. and 40 CFR 270.11(d))